

John A. Kawai, CSBN 260120
 CARPENTER, ZUCKERMAN & ROWLEY
 407 Bryant Circle, Suite F
 Ojai, CA 93023
 Tel: (805) 272-4001
 Fax: (805) 719-6858
 Email: jk@czrlaw.com
 Attorneys for Plaintiffs

Deborah A. Bianco, *Pro Hac Vice*
 14535 Bel-Red Road, #201
 Bellevue, WA 98007
 (425) 747-4500
 Email: deb@debbiancolaw.com
 Attorney for Plaintiffs Maureen, Pia,
 And Mya

Carol L. Hepburn, *Pro Hac Vice*
 PO Box 17718
 Seattle, WA 98127
 Tel: (206) 957-7272
 Fax: (206) 957-7273
 Email: carol@hepburnlaw.net
 Attorney for Plaintiffs Lily, Sarah,
 Skylar, Savannah, Sally, Sierra, Violet,
 Amy, Erika, Tori, Jenny, and Jessica

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

“Amy,” et. al.,

Plaintiffs,

v.

RANDALL STEVEN CURTIS

Defendant.

Case No: 3:19-CV-02184PJH

PLAINTIFFS’ REPLY IN SUPPORT OF
 PLAINTIFFS’ MOTION FOR SUMMARY
 JUDGMENT

NOTE ON MOTION CALENDAR:

Date: February 25, 2021

Time: 1:30 pm

Judge: Honorable Phyllis J. Hamilton
 Chief United States District Court Judge

Plaintiffs submit the following reply in support of their motion for summary judgment.

TABLE OF CONTENTS

	Page
MEMORANDUM OF POINTS AND AUTHORITIES	3
A. Plaintiffs' Disclosures were timely made	4
B. The Court's response to claims of discovery problems must consider the totality of the circumstances and be mindful of the proportionate remedial measures available	6
C. Courts have found affidavit evidence from law enforcement POCs sufficient to support findings of victim status	7
D. Declarations of the timely disclosed law enforcement POCs are good and sufficient evidence	8
E. Defense counsel had long ago seen and received descriptions of the images	9
i. FRE 408 allows consideration of correspondence of counsel to negate delay in disclosure	11
F. Declaration of parents of Plaintiffs are well founded	12
G. Defendant's declaration is of no import	13
H. Defendant has still failed to adequately to give notice of constitutional Questions	13
I. Summary of evidence shows sufficient support for summary judgment	14
CONCLUSION	16

TABLE OF AUTHORITIES

Caselaw	Page
<i>Amersham Pharmacia Biotech, Inc. v. Perkin Elmer Corp.</i> , 190 F.R.D. 644, 648 (N.D. Cal. 2000)	6
<i>Connecticut General Life Ins. Co. v. New Images of Beverly Hills</i> , 482 F.3d 1091 , 1096 (9th Cir. 2007)	6
<i>Fjelstad v. Am. Honda Motor Co.</i> , 762 F.2d 1334 , 1338 (9th Cir. 1985)	6
<i>IBM v. Fasco Indus.</i> 1195 U.S. Dist. LEXIS 22533, NDCA 95-CV-02241	4, 6,7
<i>Insurance Corp. of Ireland, Ltd. v. Compagnie des Bauxites de Guinee</i> , 456 U.S. 694 , 707, 102 S.Ct. 2099 , 72 L.Ed.2d 492 (1982)	6

<i>Jensen v. BMW of North America</i> , 331 F.R.D. 384 (S.D.Cal. 2019)	6
<i>Liaw v. United Airlines</i> , 2019 U.S. Dist. Lexis 204492	5,6
<i>Matsushita Elec. Indus. Co. v. Zenith Radio</i> , 475 U.S. 574, 587 (1986)	16
<i>Okla. Ex rel. Edmondson v. Pope</i> , 516, F.3d 1214, 1214 (10 th Cir., 2008)	14
<i>United States v. Denault-Reynolds</i> , 810 Fed. Appx. 38 (2d Cir. 2020)	7,8
<i>Wendt v. Host International</i> , 125 F.3d 806, at 814 (9 th Cir. 1997)	6
Statutes and Court Rules	
18 U.S.C. §3509	4
28 U.S.C §2403	14
FRE 408	11
Fed. R. Civ.P. 5.1	13,14
Local Civil Rule 3-8	14

MEMORANDUM OF POINTS AND AUTHORITIES

Defendant's complaints avoid the issues presented in the Motion for Summary Judgment. Five of six issues Defendant raises in his response are directed at striking declarations. Boiled down and scrubbed of adjective and adverbs, Defendant's opposition is based on striking all declarations in Plaintiffs' motion and claiming that Mr. Laws' testimony should be disregarded by the court. Defendant has no argument on the substance of the matter, and has chosen instead to make multiple arguments about discovery disclosures based on false allegations and imputations of nefarious motives. Despite raising discovery issues in response to a Motion for Summary Judgment, Defendant does not dispute the identities of Plaintiffs whose images were found in the defendant's media.

The questions raised by defense counsel must be put in context. Given that the nature of the evidence is contraband, there are difficulties in working with and presenting the evidence to the court. Plaintiffs cannot simply look at Mr. Curtis' images in the comfort of their home, in their attorney's office, nor can counsel

1 simply attach such a photo to a declaration and file in the court. And, this is the first case bringing evidence to
 2 court which utilized the 18 USC §3509 procedure allowing victims to view their images.

3 There is no basis for the court to strike the Declarations that support the Plaintiffs' Motion for Summary
 4 Judgment, which is a draconian sanction in any event. *IBM v. Fasco Indus.* 1995 U.S. Dist. LEXIS 22533.
 5 There is no basis for the court to refuse to consider the evidence contained in the Plaintiffs' submissions.
 6 Defendant has failed to address the issues related to Summary Judgment, and chose to focus his attention on
 7 complaints about discovery that have little to no bearing on this issues before the Court. For the reasons set
 8 forth below, the court should grant Plaintiffs summary judgment in this matter.
 9

10 **A. Plaintiffs' disclosures were timely made.**

11 The parties spent months through the fall and into the winter working on discovery matters, conferring
 12 by telephone and email. Plaintiffs produced volumes of information about themselves, their locations,
 13 identities, the production of the images of each of them, and provided documentation identifying and describing
 14 the images contained on the media that was seized from Defendant. See Declaration of Michelle Sparks
 15 (hereinafter "Sparks Declaration") and Ex. 5 --chart outlining documents and information produced by Plaintiffs
 16 to Defendant.

17 The Magistrate's Order on discovery was entered September 8, 2020. Dkt. # 106. It held that a child
 18 pornography victim need not prove actual damages where liquidated damages only are claimed and that
 19 plaintiffs herein had shown that they were victims of defendant's crime. This changed the posture of the case
 20 and obviated the need to prove identity or damages. This court's Order on Discovery amending in part the
 21 Magistrate's Order was entered 10-26-20. Dkt.#131 This order changed the posture of the case again and
 22 required proof herein that Plaintiffs are the victims from the underlying criminal case. Plaintiffs' supplemental
 23 disclosures were filed 2 days later on October 28, 2020.
 24

25 Plaintiffs *have* answered Defendant's interrogatories and second set of requests for production. See
 26 Sparks Dec. ¶7, Ex. 6.

27 No request has been made by defendant to depose anyone other than plaintiffs themselves or their
 28 guardians. Defendant did not request to amend the case management schedule. Upon receipt of the
 --

supplemental disclosure with additional witnesses Defendant did not request a Meet and Confer, a discovery conference, or make a motion to the court. No request was made to extend discovery in any way. (Indeed, expert discovery is still open.) Defendant has now chosen instead to raise a catalog of discovery complaints at this late juncture, in an effort to derail Plaintiffs' Motion for Summary Judgment. Defendant's delay in raising these alleged abuses belies any great prejudice he says he suffers. *See, Liaw v. United Airlines*, (2019 WL 6251204) NDCA 19-CV-00396.

Further, despite serving two additional sets of discovery seeking Plaintiffs' communications with Congress and the date plaintiffs knew of defendant Curtis, defendant chose not to use interrogatories which might have disclosed any number of facts he now complains were withheld. Defendant has failed to show any prejudice he has suffered that cannot be remedied. Even if the court finds some merit to defendant's arguments, the severe remedy that defendant seeks, outright exclusion of the evidence and evisceration of these plaintiffs' case, is not appropriate given the issues before the court.

B. The court's response to claims of discovery problems must consider the totality of the circumstances and be mindful of proportionate remedial measures available.

The situation here is not unlike that in *Liaw v. United Airlines, supra*, where the Plaintiff "raised a litany of discovery complaints" in conjunction with a motion for summary judgment. In granting summary judgment for the defendant, the Court said:

Even assuming preclusion may be warranted "regardless of whether any discovery motion was made," as Liaw contends, his current laundry list of alleged discovery fouls made by United, which he apparently allowed to pile up, suggests that he failed to diligently pursue discovery. He may not be heard to complain now of United's alleged stonewalling for the first time at this late stage. And, the fact that Liaw did not seek prior court intervention throughout the course of this litigation indicates that any prejudice he might have incurred by United's alleged stonewalling is minimal.

The court denied the requested sanction of striking the Defendant's expert reports and granted summary judgment for the Defendant.

Exclusion sanctions based on alleged discovery violations are generally improper absent undue prejudice to the opposing side." *Amersham Pharmacia Biotech, Inc. v. Perkin Elmer Corp.*, 190 F.R.D. 644, 648 (N.D. Cal. 2000) (citing *Wendt v. Host International*, 125 F.3d 806, at 814 (9th Cir. 1997)).

In *Jensen v. BMW of North America*, 331 F.R.D. 384 (S.D.Cal. 2019), the Plaintiff requested “terminating” sanctions as to its several causes of action, including liability . The Court noted that

“While terminating sanctions are contemplated under Rule 37, they are only warranted under “extreme circumstances.” *Fjelstad v. Am. Honda Motor Co.*, 762 F.2d 1334, 1338 (9th Cir. 1985). Furthermore, any imposed sanction under Rule 37(b)(2) must be “specifically related to the particular ‘claim’ which was at issue in the order to provide discovery.” *Insurance Corp. of Ireland, Ltd. v. Compagnie des Bauxites de Guinee*, 456 U.S. 694, 707, 102 S.Ct. 2099, 72 L.Ed.2d 492 (1982).”

The Court also noted that “one of the factors to be considered before ordering terminating sanctions is the availability of less drastic sanctions. *Connecticut General Life Ins. Co. v. New Images of Beverly Hills*, 482 F.3d 1091, 1096 (9th Cir. 2007).” Similarly, in *IBM v. Fasco Indus.*, the Court noted, “while Fasco's behavior must be taken seriously, it would be draconian for this court to exclude all of Fasco's rebuttal experts. Given the importance of technical issues to this case, the trial would be over before it started. *IBM v. Fasco Indus.* 1195 U.S. Dist. LEXIS 22533.

Plaintiffs have complied in good faith with the Court Rules and there is no basis for the Court to impose sanctions upon plaintiffs by striking their evidence in the context of a Motion for Summary Judgment. Here, there are no orders to Compel, or other Court orders that plaintiffs or their counsel have violated. There are only the Defendant’s many complaints, which are not a basis for the Court to strike Plaintiffs’ evidence or deny relief to Plaintiffs. The issue before the Court is summary judgment, not a Motion to Compel.

C. Courts have found affidavit evidence from law enforcement POCs sufficient to support findings of victim status.

Plaintiffs Lily, Maureen, Sarah, Pia, Mya, and Violet have all submitted declarations from their law enforcement designated POCs identifying them in the Curtis images and attesting to the sexual content of the images.¹ Affidavit testimony of POCs for Maureen and Jenny identifying them in sanitized images were affirmed by the Second Circuit to be sufficient to support the district court’s order of restitution in *United States v. Denault-Reynolds*, 810 Fed. Appx. 38 (2d Cir. 2020). There the defendant challenged on Constitutional

¹ See Findlay and Shepherd Decs. for Lily, Rothrock Dec. for Maureen, Behymer Dec. for Sarah, Dec. re Mya and Pia (of Adele Brown) for Mya and Pia, and Stetler Dec. for Violet.

grounds the district court's determination that the victims requesting restitution were in fact the people portrayed in the images on the defendant's computer media. The court relied on the affidavit of the POC for the Lighthouse series which includes Maureen (one of the Plaintiffs herein)² and the affidavit of and email from the POC for Jenny (one of the Plaintiffs herein also.) The agents attested to their participation in the investigation of the production of the images, and their positive identification of the victims. The appellate court found that the evidence from the agents "more than amply supports" the identification finding by the court. *Id.* fn. 2.

The district court in *Denault-Reynolds* also had and relied in part on the NCMEC report on the case which flagged relevant images via unique hash values of images. Although Defendant Denault-Reynolds challenged use of this report as well, the appellate court found it unnecessary to reach that issue given the strength of the support for the finding in the evidence from the agents. The appellate court further noted that there was "a significant record before [the district court] regarding the reliability of this technology" and that nothing in the record undercut this finding. *Denault-Reynolds, supra* at fn. 2.

So too in the instant case we have as a part of the support for the identification of a number of the Plaintiffs herein the declaration of their POCs attesting to involvement in the investigation of the original production cases, positively identifying the Plaintiffs in the sanitized images, and attesting to familiarity with the sanitized images and the sexual content of the images. We also have the NCMEC reports (See Hepburn Dec. ISO MSJ Dkt.# 140 pp.27-30, Exs. 4 & 7) which were found sufficient by the district court in *Denault-Reynolds*.

D. Declarations of the timely disclosed law enforcement POCs are good and sufficient evidence.

Defendant contends that a portion of the law enforcement witnesses are offering expert testimony. He has yet to request any deposition of any of them. Plaintiffs timely disclosed law enforcement Points of Contact as lay and expert witnesses, both. Defendant has not brought his disclosure complaints to Plaintiffs or the court before now.

² The POC for Maureen in *Denault-Reynolds* was Detective Andy Byers who has since been in a serious injury accident so retired agent Rothrock has stepped back in to be the POC for Maureen and her sisters.

Defendant was in possession of identifying and contact information on all POCs who submitted declarations, save one, from the time of the criminal prosecution; counsel for defendant received their names and contact information in the criminal case discovery. Defendant himself produced the NCMEC report which names the majority of the POCs. See Hepburn Dec. ISO MSJ Ex. 4. Plaintiffs further produced in February 2020 and again in May/June 2020 the NCMEC Attorney Series Information Reports (“ASIRs”) which contained identification and contact information for all POCs save for Violet and for Amy. See Sparks Dec. ¶5, Ex. 4.

Law enforcement witnesses (POCs) were also identified in Plaintiffs’ supplemental disclosures two days after the Order on Discovery which made clear that identification might be by declaration. POCs were identified as experts within the time for expert disclosure. Dec. of Michelle Sparks, ¶3 & Ex. 7.

Despite knowing of the POCs from the criminal matter, Plaintiffs’ responses to written discovery, and receiving the disclosures of Plaintiffs in October and November, 2020, Curtis never requested depositions of any of the POCs. Indeed, expert discovery is still open. Curtis does not explain why he did not seek depositions of the POCs; he simply wants to exclude them.

E. Counsel for Defendant long ago seen and received written descriptions of the images.

Counsel for Defendant had both seen the CSAM images of the Plaintiffs, and had received written descriptions of the CSAM images depicting Plaintiffs, in the restitution phase of the criminal case. He produced proof of same to Plaintiffs in response to discovery. Hepburn Dec. ISO MSJ Dkt. 140, p. 27, Ex. 6. Also, Plaintiffs did disclose in discovery a number of sanitized images of themselves which were all they had at the time³. However, because of the fact that images of Plaintiffs’ child sexual abuse are contraband, and the trauma occasioned to some witnesses upon viewing images of their abuse (See Dec. of Lily ISO MSJ, Dkt. #140, pp. 338-341, ¶7.) it was necessary for Plaintiffs to hire Mr. Laws to view the evidence necessary to allow them to

³ “Sanitized” images refers to CSAM images which have been redacted of the sexual portion of the image.

1 prove their case. The evidence of defendant's crime and plaintiffs' victimization remains by law in the
2 possession of the government and may not be possessed by Plaintiffs' or their counsel.

3 Plaintiffs are not legally allowed to possess or examine the original evidence, nor are Plaintiffs or their
4 counsel allowed to possess a clone of the contraband to conduct any examination outside of the confines of a
5 government building or the courthouse. Plaintiffs' representative, Mr. Laws, was provided the evidence from
6 the criminal case by the case agent and Mr. Laws was only able to view and analyze the evidence in the HSI
7 office in California. Defendant's argument ignores the fact that the process of allowing a victim to view the
8 evidence of their images in a child pornography prosecution is entirely new, and had not been done before this
9 case. Dec. of Kevin Laws of 2/5/21 ¶3. Plaintiffs' representative could not simply knock on the HSI door and
10 demand to see case evidence. No protocol had been devised for this process as no one had a right to view their
11 images before. It was necessary to arrange a meeting with a senior official in HSI to discuss the request and,
12 once the meeting took place, for that person to consult with the agency's legal counsel, and then to settle on a
13 protocol. Dec. of Kevin Laws of 2/5/21 ¶4

15 The meeting concerning protocol with HSI, in Fairfax, Virginia, took place on January 17, 2020. After
16 the meeting HSI indicated the need to confer with HSI legal counsel. In early February Mr. Laws reached out to
17 the supervisor in the HSI office in San Francisco, Christina Barfuss. She was unavailable until February 19,
18 2020. It was necessary for SSA Barfuss to communicate with HSI headquarters to confirm the protocol for the
19 review. In the meantime COVID19 caused lockdowns across the country, limited the safety of travel, and
20 caused most businesses and government operations in the U.S. and in the state of California to dramatically
21 curtail operations for months, and which is continuing. Dec. of Kevin Laws of 2/5/21 ¶¶4 & 5.

23 The first date offered by HSI for the evidence review was the week of July 13, 2020. This time was
24 accepted by Plaintiffs and was when the review took place. Mr. Laws traveled from Virginia to California,
25 where he reviewed and identified the images of plaintiffs' pursuant to statutory procedure under 18 USC 3509.
26 Dec. of Kevin Laws of 2/5/21 ¶5. Mr. Laws received sanitized photos from the Curtis case agent on October
27 13, 2020. Dec. of Kevin Laws of 2/5/21 ¶6. Sanitized Curtis images were disclosed in Laws expert disclosure
28 on November 30, 2020. Sparks Dec. Ex. ¶3, Ex 1.

1 Defendant made no mention at that time of any deficiencies.

2 In view of the problems inherent in working with contraband which can only be possessed by the
3 government, in view of the matter being one of first impression in the nation on how to conduct discovery and
4 present proof with contraband of this nature in a civil case, we ask that plaintiffs be allowed to summon the
5 case agent to court should there be a question about the child exploitation content of the images in Curtis'
6 collection.

7
8 **i. FRE 408 allows consideration of correspondence of counsel to negate delay in disclosure.**

9 Exhibit 6 to the Hepburn Declaration is admissible to negate allegations of prejudice to defendant from
10 supposed undue delay. Ex. 6 details arrangements for defense counsel to view the actual contraband in mid-
11 2018. Ex. 6 further contains admission by Mr. Curtis' then counsel of the content of a portion of the images in
12 this matter which shows that the images had been seen. (Ex. 6 RSCURTIS CONFIDENTIAL 00134-38, 01627-
13 29.) These latter statements do include negotiation of settlement of restitution, but that is not the purpose for
14 offering them. FRE 408(b) allows admission for purposes of negating undue delay. Defense counsel had thus
15 long ago seen the images themselves, made record of the content, and the government had further supplemented
16 the description of the images, so any alleged delay in receiving the sanitized images produced in the expert
17 disclosure was of no harm.

18
19 **D. Declarations of the parents of Plaintiffs are well founded.**

20 Defendant's complaints about the declarations of the parents (Category IV) are twofold—late
21 disclosure and hearsay. Both arguments fail on close examination.

22 All of the parents, save one—Violet's mother—are named parties herein. Defendant himself
23 recognized that the parents were persons with information germane to the Plaintiffs' claims in that he
24 disclosed them in his initial disclosures, as well as two subsequent amended initial disclosures. See,
25 Bianco Dec. ¶5. Two days after the court's Order on Discovery, which changed the posture of the case,
26 Plaintiffs served their supplemental disclosure which specifically named the parents. Indeed, it was not
27 new information to him as he had already identified them as having discoverable information. At no
28

1 point did Defendant seek deposition on written questions, move to compel their oral depositions or in any
2 way bring to the court his complaint the timing of naming of the parents.

3 Defendant would have the court strike the entire declarations of the adoptive parents John Doe and
4 Jane Doe (re Sierra, Sally, Skylar, and Savannah) because they mention receiving photographs from the
5 social workers of the children at an earlier age. The basis of the parents' identifications are not
6 necessarily *only* based on these, because the children continue to look today much as they did at a
7 younger age.
8

9 As to Sierra and Sally: "The facial features of both of the girls have not changed much. They
10 each still resemble the photos we have of them when they were younger." Dec. of John Doe ¶4. Thus, he
11 recognizes them as they still look like the sanitized photos. Sally came to their family at age 6; Sierra
12 joined the family at age 13. Their father has years of parenting these girls on which to base his
13 identification.

14 As to Skylar and Savannah:

15 "My husband and I became foster parents and then adoptive parents for Skylar and Savannah not
16 long after they were rescued from the home where they were sexually abused. We received
17 photos of them from their earlier years from a social worker who was overseeing their case. The
18 girls have continued to look much the same as their early photos through the time that they have
19 been with us. Both are still minors and live in our home with us as they have since we became
20 their foster parents."

21 Dec. of Jane Doe ¶2. Again, these minor girls are identified based on their current appearance which has
22 continued to be similar

23 As to Pia and Mya, the Defendant complains, apparently, about the formatting of the Declaration of
24 Jane Roe. The Declaration was transmitted electronically, and whether the Declarant changed the formatting of
25 the signature page before signing it, or whether the formatting of that one page was changed in the process of
26 electronic transmission, the substance of the Declaration is accurate, and has not been altered. See Declaration
27
28
29

of Deborah A. Bianco, ¶¶4&5. There is no basis to strike the Declaration of Jane Roe identifying the images of her daughters in the Defendant's child pornography collection.⁴

E. Defendant's Declaration is of no import.

It is irrelevant and immaterial how defendant acquired the CSAM of Plaintiffs, or whether he paid for those images. What is material is that he possessed and transported the CSAM images of Plaintiffs.

F. Defendant has still failed to adequately give notice of Constitutional questions.

FRCP 5.1 provides:

(a) Notice by a Party. A party that files a pleading, written motion, or other paper drawing into question the constitutionality of a federal or state statute must promptly:

(1) file a notice of constitutional question stating the question and identifying the paper that raises it, if:

(A) a federal statute is questioned and the parties do not include the United States, one of its agencies, or one of its officers or employees in an official capacity; or

(B) a state statute is questioned and the parties do not include the state, one of its agencies, or one of its officers or employees in an official capacity; and

(2) serve the notice and paper on the Attorney General of the United States if a federal statute is questioned—or on the state attorney general if a state statute is questioned—either by certified or registered mail or by sending it to an electronic address designated by the attorney general for this purpose.

Defense counsel's notice to the AUSAs in the criminal matter do not put the U.S. government on notice as required by FRCP 5.1.

Federal Rule of Civil Procedure 5.1 requires a party contesting the constitutionality of a federal statute to *promptly* serve the Attorney General of the United States with notice of the action. *Okla. Ex rel. Edmondson v. Pope*, 516, F.3d 1214, 1214 (10th Cir., 2008); Fed. R. Civ. P. 5.1. The Defendant has apparently only on February 3, 2021 filed a Notice of Constitutional Questions. Dkt.#153. There is no proof of service on the Attorney General or the United States Attorney for the District. Serving the Assistant U.S. Attorney involved in

⁴ Despite Defendant's complaint about the Jane Roe Declaration it must be noted that his own declaration was filed without any signature on the filing deadline and was then filed with a signature four days later.

the criminal case against Defendant as he claims was done on September 17, 2020, is insufficient notice on its face under FRCP 5.1 and Local Civil Rule 3-8.

It is still left to the court to certify the constitutional question under 28 U.S.C. §2403.

G. Summary of evidence shows sufficient support for summary judgment.

Defendant fails to challenge the substance of any declaration supporting Plaintiffs' motion. Indeed, how can he? What can he say to a victim or a parent saying "That is me" or "That is my child." What can he say to a law enforcement officer who was a part of the child's rescue who says "Yes, that is the child who was sexually tortured."

For the court's convenience the following is a table of the proof submitted in support of each of the Plaintiffs' claims:

Name of Plaintiff	Plaintiff or parent identifies	POC identifies/ Laws identifies	Sexual Content Described
Amy	Yes (identifies bedsheets and position) Dec. of Amy, ¶5		Yes (identifies abuse occurring on bedsheets and position) Dec. of Amy, ¶5
Lily		Yes Dec. of Findlay, ¶¶4, 7-10 Dec. of Shepherd, ¶¶5,6, 10-12 Dec. of laws, ¶9(d)	Yes Dec. of Findlay ¶¶4, 7-10 Dec. of Shepherd, ¶¶5,6, 10-12 Dec. of laws, ¶9(d)
Sarah	Yes Dec. of Sarah, ¶6	Yes Dec. of Behymer, ¶¶ 4&6	Yes Dec. of Behymer ¶6 Dec. of Sarah, ¶6
Maureen	Yes Dec. of Maureen, ¶¶ 8 & 10	Yes Dec. of Rothrock, ¶¶7 & 10	Yes Dec. of Rothrock, ¶¶ 10-11 Dec of Maureen, ¶¶ 8&9
Violet	Yes Dec. of Violet's Mother, ¶¶3 & 5	Yes Dec. of Stetler, ¶¶ 4&6 Dec. of Laws ¶9(a)	Yes Dec. of Stetler ¶7 Dec. of Laws, ¶9(a)
Pia	Yes Dec. of Jane Roe, ¶¶ 7,& 8	Yes Dec. re Mya & Pia (Brown) ¶¶ 5 & 12-18 Dec. of Laws ¶ 9(c)(ii)	Yes Dec. re Mya & Pia (Brown) ¶¶ 5 & 12-18 Dec. of Laws ¶ 9(c)(ii)
Mya	Yes Dec. of Jane Roe, ¶6	Yes Dec. re Mya & Pia (Brown) ¶¶ 5 & 11	Yes Dec. re Mya & Pia (Brown) ¶11

		Dec. of Laws ¶ 9(c)(i)	Dec. of Laws ¶ 9(c)(i)
Erika/Tori	Yes Dec of Jane Smith (room décor, tan line and physiques of daughters)¶¶ 6&7		Yes, mother recognizes scene of abuse
Sierra	Yes Dec. of John Doe ("facial features not changed much")¶4 ("you can see the resemblance[to the sanitized photos] in them today also.") ¶6		Yes, Dec. of Laws, ¶9(b)(i)
Sally	Yes Dec. of John Doe ("facial features not changed much")¶4 ("you can see the resemblance[to the sanitized photos] in them today also.") ¶6		Yes, Dec. of Laws ¶9(b)(iv)
Skylar	Yes Dec. of Jane Doe ""became . . .parents not long after rescue" ¶2 "have continued to look much the same" ¶2 "image is Skylar" ¶4		Yes Dec. of Laws, ¶9(b)(iii)
Savannah	Yes Dec. of Jane Doe ""became . . .parents not long after rescue" ¶2 "have continued to look much the same" ¶2 "image . . is Savannah" ¶4		Yes Dec. of Laws, ¶9(b)(ii)
Jessica	Yes Dec of Mother Alyssa Cooper, ¶ 6		
Jenny	Yes Dec. of Jenny, ¶5		Yes Dec. of Jenny, ¶5

The issues presented here are not complex⁵ For most of the plaintiffs the facts are clear. Plaintiffs or their parents have identified themselves in the images from Mr. Curtis' child pornography collection that served as the basis for his criminal conviction of child pornography crimes. Defendant avoids addressing the

⁵ Defendant's reliance on adjectives and adverbs notwithstanding

inconvenient fact of Plaintiffs saying “that photo is of me.” But Plaintiffs do not ask the court to rely only upon their declarations, alone. Plaintiffs’ law enforcement Points of Contact (“POCs”) have also testified as percipient witnesses to knowing the plaintiffs, to recognizing the images even with redactions, and to knowing the sexual content of the images.

Finally, Mr. Laws testified as to the electronic evidence related to Mr. Curtis’ child pornography collection, and Mr. Laws was able to personally verify some, if not all, of the Plaintiffs’ images in the collection he viewed at the Homeland Security Investigations (“HSI”) office in San Francisco.

CONCLUSION

"[W]here the record taken as a whole could not lead a rational trier of fact to find for the non-moving party, there is no genuine issue for trial." *Matsushita Elec. Indus. Co. v. Zenith Radio*, 475 U.S. 574, 587 (1986) (internal quotation marks omitted). Here, the record as a whole supports Plaintiffs’ request for Summary Judgment. Defendant pled guilty to transportation and possession of child pornography. There is ample evidence, not refuted by Defendant, that Plaintiffs’ images were among those possessed and transported by Defendant. Plaintiffs have proven their identities, and confirmed their images, by their own testimony, or that of their parents or guardians, by the Law Enforcement Points of Contact, and, in some cases, by Kevin Laws. Although Defendant has many complaints about Plaintiffs’ counsel and their presentation, he has not raised any disputed fact that prevents this court from granting Plaintiffs’ Motion for Summary Judgment.

Respectfully submitted,

Dated: February 5, 2021.

CARPENTER, ZUCKERMAN & ROWLEY

By: /s John A. Kawai
John A. Kawai, CSBA No. 260120
407 Bryant Circle, Suite F
Ojai, CA 93023
Phone: 805-272-4001

CAROL L. HEPBURN, P.S.

By: /s Carol L. Hepburn
Carol L. Hepburn, *Pro Hac Vice Admitted*
PO Box 17718
Seattle, WA. 98127
(206) 957-7272 phone

(206) 957-7273 fax
Emails: carol@hepburnlaw.net

DEBORAH A. BIANCO P.S.

By: s/Deborah A. Bianco
Deborah A. Bianco, *Pro Hac Vice Admitted*
PO Box 6503
Bellevue, WA 98008
Phone: 425-747-4500
Facsimile: 425-747-8400
Email: deb@debbiancolaw.com

Attorneys for Plaintiffs

John A. Kawai, CSBN 260120
CARPENTER, ZUCKERMAN & ROWLEY
400 South 4th Street, Suite 500
Las Vegas, NV. 89101
Tel: (805) 272-4001
Fax: (805) 719-6858
Email: jk@czrlaw.com
Of Attorneys for Plaintiffs

Deborah A. Bianco, *Pro Hac Vice*
14535 Bel-Red Road, #201
Bellevue, WA 98007
(425) 747-4500
Email: deb@debbiancolaw.com
Attorney for Plaintiffs Maureen, Pia,
And Mya

Carol L. Hepburn, *Pro Hac Vice*
PO Box 17718
Seattle, WA 98127
Tel: 206) 957-7272
Fax: (206) 957-7273
Email: carol@hepburnlaw.net
Attorney for Plaintiffs Lily, Sarah,
Skylar, Savannah, Sally, Sierra, Violet,
Amy, Erika, Tori, Jenny, and Jessica

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

“Amy,” et. al.,

Plaintiffs,

v.

RANDALL STEVEN CURTIS

Defendant.

Case No: 3:19-CV-02184PJH

DECLARATION OF MICHELLE D.
SPARKS IN SUPPORT OF PLAINTIFFS’
MOTION FOR SUMMARY JUDGMENT

NOTE ON MOTION CALENDAR:

Date: February 25, 2021

Time: 1:30 pm

Judge: Honorable Phyllis J. Hamilton

Chief United States District Court Judge

I, MICHELLE SPARKS hereby declare as follows:

1 1. I am of legal age and competent to testify to the matters set forth below. I make this
2 declaration based on my own personal knowledge and it is true and accurate to the best of my personal
3 knowledge. This declaration is consistent with the testimony I would give on these subjects in a court
4 of law.
5

6 2. I am a paralegal and have been working for Carol L. Hepburn for ten years in the State of
7 Washington. We represent the Plaintiffs herein. I make this Declaration in support of Plaintiffs'
8 Motion for Summary Judgment.

9 3. On October 28, 2020, we served defense counsel Ethan Balogh and Nara Sugino of
10 Coleman Balogh, Plaintiffs' Supplemental Disclosures. Attached at Exhibit 7 is a true and correct
11 copy of Plaintiffs' Supplemental Disclosures and the email from Carol L. Hepburn with said
12 disclosure.
13

14 3. On November 30, 2020, I served defense counsel Ethan Balogh and Nara Sugino of
15 Coleman Balogh, Plaintiff's Expert Witness Disclosure and attachments via a dropbox link. I created
16 the link in dropbox and copied it into the email dated November 30, 2020 to share with defense and
17 plaintiffs' counsel. Attached as Exhibit 1 is a true and correct copy of the email with the dropbox link
18 to Ethan Balogh and Nara Sugino as well as to all plaintiffs' counsel and staff. Attached at Exhibit 2
19 is a screen shot of my dropbox sub-directory showing all documents produced with Plaintiffs' Expert
20 Witness Designation on November 30, 2020 to defense counsel, Ethan Balogh.
21

22 4. Attached as Exhibit 3 is a true and correct copy of the Plaintiffs' Disclosure of Expert
23 Witnesses served on defense counsel November 30, 2020. At no. 7A-J, pp. 5-9, the law enforcement
24 agents are listed per series of CSAM child pornography images.
25

26 5. During the course of responding to Defendant's Requests for Production herein Plaintiffs
27 also produced information in the form of Attorney Series Information Reports from the National
28

Center for Missing and Exploited Children (NCMEC). These reports were produced twice, initially without Bates numbers, and then a second time all reports were again produced with Bates numbers.

The dates of production are as follow:

Amy 2/7/20 and 5/15/20
Erika 2/7/20 and 5/8/20
Jenny 2/7/20 and 5/12/20
Jessica 2/7/20 and 5/13/20
Lily 2/7/20 and 6/18/20
Maureen 2/12/20 and 5/20/20
Mya 2/12/20 and 5/22/20
Pia 3/13/20 and 5/22/20
Sally 2/27/20 and 6/4/20
Sarah 2.7.20 and 5/29/20
Savannah 2/7/20 and 6/7/20
Sierra 2/7/20 and 6/12/20
Skylar 2/7/20 and 6/8/20
Tori 2/7/20 and 5/8/20
Violet 2/7/20 and 6/8/20

True and correct copies of the reports are attached hereto at Ex. 4.

6. Attached at Ex. 5 is a true and correct copy of Plaintiffs' Production Chart.

7. We produced answers and responses to Defendant's Special Interrogatory and Second Set of Requests for Production of Documents on January 22, 2021. Attached at Ex. 6 are a true and correct copies of Plaintiffs' Answer to Defendant's Special Interrogatory and Plaintiffs' Responses to Defendant's Second Requests for Production.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

DATED this 5th day of February, 2021

CAROL L. HEPBURN, P.S.

By /s/ Michelle D. Sparks
Paralegal to Carol L. Hepburn
PO Box 17718

Seattle, WA 98127
(206) 957-7272
(206) 957-7273 fax
Email: michelle@hepburnlaw.net

From: Michelle Sparks michelle@hepburnlaw.net
Subject: Amy et al., v. Randall Steven Curtis = Pltfs' Expert Witness Disclosure dropbox link
Date: November 30, 2020 at 3:11 PM
To: Ethan A. Balogh eab@colemanbalogh.com, Nara Sugino nas@colemanbalogh.com
Cc: Carol Hepburn carol@hepburnlaw.net, Debbie Bianco bianco.lawyers@gmail.com, John Kawai jk@czrlaw.com, Grayson Yoder gyoder@czrlaw.com, Ashley Nicole Deatherage adeatherage@czrlaw.com, Veronica Stanwood VStanwood@czrlaw.com, Mr. James R. Marsh Esq. jamesmarsh@marsh.law, Maggie Mabie margaretmabie@marsh.law

See that attached dropbox link for Pltfs' Expert Witness Disclosure and the attachments. Michelle

<https://www.dropbox.com/sh/x3nk142fskg2nj2/AACOIRJJyrl9AwJbNh3Lw8Kza?dl=0>

Michelle D. Sparks, Paralegal
Carol L. Hepburn, P.S.
PO Box 17718
Seattle, WA 98127
206-957-7272
206-957-7273 fax

michelle@hepburnlaw.net

This email is intended only for the addressee shown above. It may contain information that is privileged and confidential, or otherwise protected from disclosure. Any review, dissemination or use of this transmission or its contents by persons other than the addressee is strictly prohibited. If you have received this transmission in error, please notify us immediately by telephone and delete this transmission. Thank you.



All files

Recents

Starred

Shared

File requests

Deleted files

Dropbox > Curtis, Randall Steven > attachments to Kevin Laws re Pltfs Expert Disclosure

View upgrade options

Search



Overview

Hide

Click here to describe this folder and turn it into a Space

Show examples

+ Create

Upload



Name ↑	Modified	Members
Affidavit L Coffren of NCMEC.01 08 20 2.PASSWORD = NCMEC_001.pdf	☆ 11/30/2020, 3:05 PM	Only you
Affidavit of Signy Arnason of C3P.Curtis.100719.pdf	☆ 11/30/2020, 3:05 PM	Only you
At School Series re Violet Report by Kevin Laws.Curtis.pdf	☆ 11/30/2020, 2:42 PM	Only you
Fee schedule.pdf	☆ 11/30/2020, 2:49 PM	Only you
Jan_Socks1 Series re Sierra by Kevin Laws.Curtis.pdf	☆ 11/30/2020, 2:42 PM	Only you
Jan_Socks2 Series re Savannah Report by Kevin Laws.Curtis.pdf	☆ 11/30/2020, 2:49 PM	Only you
Jan_Socks3 re Skylar Report from Kevin Laws.Curtis.pdf	☆ 11/30/2020, 2:49 PM	Only you
Jan_Socks4 re Sally Report by Kevin Laws.Curtis.pdf	☆ 11/30/2020, 2:49 PM	Only you
Jenny Series re Jenny by Kevin Laws.Curtis.pdf	☆ 11/30/2020, 2:49 PM	Only you
Kevin J. Laws signed Affidavit Amy 05.03.2020.pdf	☆ 11/30/2020, 2:49 PM	Only you
Kevin J. Laws signed Affidavit Erika 05.03.2020.pdf	☆ 11/30/2020, 2:49 PM	Only you
Kevin J. Laws signed Affidavit Jenny 05.03.2020.pdf	☆ 11/30/2020, 2:49 PM	Only you
Kevin J. Laws signed Affidavit Jessica 05.03.2020.pdf	☆ 11/30/2020, 2:49 PM	Only you
Kevin J. Laws signed Affidavit Tori 05.03.2020.pdf	☆ 11/30/2020, 2:49 PM	Only you

attachments to Kevin Laws re Pltfs Expert ...
Modified 11/30/2020, 2:42 PM

Share





All files

Recents

Starred

Shared

File requests

Deleted files

Dropbox > Curtis, Randall Steven > attachments to Kevin Laws re Pltfs Expert Disclosure

View upgrade options

Search



+ Create

Upload



Name ↑	Modified	Members
Kevin J. Laws signed Affidavit Erika 05.03.2020.pdf	11/30/2020, 2:49 PM	Only you
Kevin J. Laws signed Affidavit Jenny 05.03.2020.pdf	11/30/2020, 2:49 PM	Only you
Kevin J. Laws signed Affidavit Jessica 05.03.2020.pdf	11/30/2020, 2:49 PM	Only you
Kevin J. Laws signed Affidavit Tori 05.03.2020.pdf	11/30/2020, 2:49 PM	Only you
Kevin Laws Resume and Testimony.pdf	11/30/2020, 2:49 PM	Only you
Lily signed dec 08072020.pdf	11/30/2020, 2:49 PM	Only you
Mya signed dec 08072020.pdf	11/30/2020, 2:49 PM	Only you
Pia signed dec 08072020.pdf	11/30/2020, 2:49 PM	Only you
Redacted images report with attached images by Kevin Laws.Curtis.pdf	11/30/2020, 2:49 PM	Only you
Sarah signed dec 08072020.pdf	11/30/2020, 2:49 PM	Only you
Savannah_Skylar signed dec 08072020.pdf	11/30/2020, 2:49 PM	Only you
Sierra_Sally signed dec 08072020.pdf	11/30/2020, 2:49 PM	Only you
Sweet Pink Sugar Series re Mya Report by Kevin Laws.Curtis.pdf	11/30/2020, 2:49 PM	Only you
Sweet White Sugar re Pia Report by Kevin Laws.Curtis.pdf	11/30/2020, 2:49 PM	Only you
Vicky Series re Lily Report by Kevin Laws.Curtis.pdf	11/30/2020, 2:49 PM	Only you
Violet signed dec 08072020.pdf	11/30/2020, 2:49 PM	Only you

attachments to Kevin Laws re Pltfs Expert ...
Modified 11/30/2020, 2:42 PM

Share



... Privacy



John A. Kawai, CSBN 260120
 CARPENTER, ZUCKERMAN & ROWLEY
 407 Bryant Circle, Suite F,
 Ojai, CA 93023
 Tel: (805) 272-4001
 Fax: (805) 719-6858
 Email: jk@czrlaw.com
 Attorneys for Plaintiffs

Deborah A. Bianco, *Pro Hac Vice Admitted*
 PO Box 6503
 Bellevue, WA 98008
 (425) 747-4500
 Email: deb@debbiancolaw.com
 Attorney for Plaintiffs Maureen, Pia and
 Mya

Carol L. Hepburn, *Pro Hac Vice Admitted*
 PO Box 17718
 Seattle, WA 98127
 Tel: 206) 957-7272
 Fax: (206) 957-7273
 Email: carol@hepburnlaw.net
 Attorney for Plaintiffs Maureen,
 Pia, Ava, Lily, Sarah, Skylar, Savannah,
 Sally, Sierra, Violet, Amy, Erika, Tori, Jenny
 And Jessica

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

“AMY,” et al., “

Plaintiffs,

v.

RANDALL STEVEN CURTIS,

Defendant.

Case No: 3:19-CV-02184-PJH

PLAINTIFF’S EXPERT WITNESS
 DISCLOSURE PURSUANT TO FRCP
 26(a)(1) and 26(2)(A)

Plaintiffs hereby disclose possible expert witnesses, who may provide testimony at trial either
 in direct evidence of the Plaintiffs’ case or as a rebuttal for any purpose, pursuant to Fed. R. Civ. P.

26(a)(2), as follows:

PLAINTIFF’S EXPERT WITNESS DISCLOSURE
 PURSUANT TO FRCP 26(a)(1) and 26(2)(A)- 1

1. Kevin J. Laws

K&S Teaching and Consulting LLC
10816 Crest Street
Fairfax, VA 22030
Phone: 703-473-9499

Mr. Laws is a retained expert. Based on his extensive education, training, and experience concerning the investigation of child sex abuse image exploitation crimes, Mr. Laws is familiar with the images/videos discovered during the investigation of the Defendant's predicate criminal activity which forms the basis for this case, and can identify the individual Plaintiffs depicted in the images/videos discovered during the investigation of the Defendant's predicate criminal acts. Mr. Laws has viewed the child sex abuse material which is included in the evidence of the underlying criminal investigation and has met with each of the plaintiffs herein. Mr. Laws Reports, Curriculum Vitae, list of prior testimony and fee chart are attached at Exhibit A.

2. Special Agent Jason Popper

Department of Homeland Security Immigration and Customs Enforcement
Jason.popper@ice.dhs.gov
415-844-5301

Special Agent Michael Kress

Homeland Security Investigations
San Francisco International Airport
(415) 844-0815

Group Supervisor Agent Christina Barfuss

Cyber Crimes Child Exploitation
Department of Homeland Security
630 Sansome Street
San Francisco, CA 94111

Agents Popper, Kress, and Barfuss additional law enforcement agents involved in the investigation and prosecution of the Defendant which, on information and belief, include those from the Department of Homeland Security as revealed in the discovery provided to Defendant in the course of the criminal prosecution, including but not limited to retired Agent Jerald Kawai whose current

1 location is unknown to Plaintiffs, as well as related and affiliated Federal Bureau of Investigation
2 officers and special agents are non-retained experts. Their testimony to the facts related to the
3 investigation and prosecution of Defendant's crimes may be supplemented with testimony drawing on
4 their particular expertise, training, and experience in law enforcement of child exploitation crimes.
5

6 Further, Special Agent Christina Barfuss is the Group Supervisor of Homeland Security Cyber
7 Crimes/Child Exploitation Cyber Crimes Investigations Center. She may have knowledge of the
8 process involved generally and procedures relevant to the request for ECD Technical Assistance at
9 NCMEC that files be reviewed in investigations for any known child victims that were identified by
10 law enforcement in the form of a DVD obtained from Randall Steven Curtis.
11

12 3. The following law enforcement agents are non-retained experts and may have
13 knowledge of facts of the criminal offenses and investigation of those offenses which underlie this
14 civil matter. Such testimony may be supplemented with testimony drawing on their particular
15 expertise, training, and experience in law enforcement of child exploitation crimes.
16

17 **Special Agent Madonia**
Homeland Security

18 Special Agent Madonia received one (1) DVD from the submitting agent. A formal request
19 was made that the files be reviewed for any known child sex abuse image exploitation victims that
20 were identified by law enforcement in past investigations.
21

22 **Special Agent Kristina Eyler**
703-675-9760

23
24 Special Agent Eyler transferred evidence to HSI office in Washington, DC.
25

26 **4. Lauren Coffren**
Director of the Exploited Children Division of NCMEC
27 National Center for Missing and Exploited Children
333 John Carlyle Street, Suite 125
28 Alexandria, VA. 22314-5950

1 703-224-2150

2 Ms. Coffren, a non-retained expert, is the Director of the Exploited Children Division of
3 NCMEC and is responsible for overseeing the ECD's Child Victim Identification Program (CVIP)
4 analysts and support personnel as well as Victim Services. She has knowledge of the procedures
5 involving CVIP reports and their processing by NCMEC, including the procedures used to generate
6 and maintain reports, and the processing of the law enforcement request concerning child sex abuse
7 material seized from Defendant herein and identification of child sex abuse material images therein.
8 Ms. Coffren has general knowledge concerning the online circulation of the images and/or videos of
9 each Plaintiff and can identify some of the plaintiffs based on her personal acquaintance of some of the
10 Plaintiffs herein, specifically Lily, Maureen, Amy, Jessica, Jane Doe, and Jane Roe.
11
12

13 **5. Signy Arnason**
14 Associate Executive Director
15 Canadian Centre for Child Protection
16 615 Academy Road
17 Winnipeg, MB R3N 0E7
18 Canada
19 1-800-532-9135
20

21 Ms. Arnason, a non-retained expert, is the Associate Executive Director from the Canadian
22 Centre for Child Protection and has knowledge of some of the child pornography images and/or videos
23 of each of the plaintiffs herein that circulate online, general knowledge concerning the online
24 circulation of the images and/or videos of each Plaintiff and can identify some of the plaintiffs in the
25 child pornography possessed by Defendant Randall Steven Curtis based on her personal acquaintance
26 of some of the Plaintiffs herein, specifically Lily, Maureen, Amy, Jessica, Jane Doe, and Jane Roe.
27 Her testimony may include information about the operation of and resulting information from Project
28 Arachnid on the open and the "Dark Web" internet Her testimony may also include the subjects
included in her declaration of October 7, 2019 filed with the court herein.

1 **6. Matthew Stein**

2 ECD Staff

3 NCMEC

4 333 John Carlyle Street, Suite 125

5 Alexandria, VA. 22314-5950

6 703-224-2150

7 Mr. Stein, a non-retained expert, has knowledge that child pornography images were
8 identified as a result of additional analysis and searches of ECD Technical Assistance of NCMEC from
9 files obtained from the criminal investigation of Randall Steven Curtis. His testimony may include
10 information about the method of and practices of NCMEC in identifying victims of child pornography
11 from among the submissions made to NCMEC by law enforcement agencies across the country.

12 **7. Law Enforcement Points of Contact.**

13 The following potential witnesses are designated law enforcement points of contact (POC) for
14 the child pornography series comprised of the Plaintiffs' child sex assault images/videos. The POCs
15 are each non-retained experts. The POCs are in some cases law enforcement agents, active or retired,
16 who were among the agents/officers who investigated the original child pornography production cases
17 involving the Plaintiffs. These agents may testify to their personal knowledge concerning the rescue
18 of the Plaintiffs from the sexual abuse circumstances they endured as children. The POCs may testify
19 to their experience as witnesses in various prosecutions of child pornography offense defendants
20 testifying to identity and age at the time of abuse for each of the Plaintiffs. The POCs may further
21 testify to the processes in general of identifying child victims of sexual offense crimes, to the
22 identification of Plaintiffs in the child sex abuse material seized from Defendant, and to Plaintiffs
23 identities and ages at the time of abuse.
24

25 **A. SA Jeffrey Stetler**

26 Agency: Federal Bureau of Investigation

27 Email: jfstetler@fbi.gov

28 Phone Number: 360-239-9300

1 **Special Agent Scott Saxon - retired**
2 FBI
3 360-709-3377
4 Scott.saxon@ic.fbi.gov

5 Special Agents Stetler and Saxon are the Law Enforcement Point of Contact regarding
6 the At School series victim, Case No. 305C-SE-3068874. They are familiar with the images/videos in
7 this series and able to verify her identity and age.

8 **B. Special Agent Adam L. Krob**
9 **Special Agent Allison Hirsch**
10 FBI – Denver
11 alkrob@fbi.gov
12 alhirsch2@fbi.gov
13 303-313-6834

14 Special Agents Krob and Hirsch are the current Law Enforcement Points of Contact
15 regarding the four victims of the Jan_Socks series, Sierra, Sally, Skylar and Savannah, Case No. 305C-
16 DN-69921. They are familiar with the images/videos in this series and will be able to verify the
17 identities and ages of Sierra, Sally, Skylar and Savannah.

18 **C. Special Agent Daniel Ben-Meir**
19 Department of Homeland Security Immigration and Customs Enforcement
20 415-844-6950
21 Daniel.ben-meir@ice.dhs.gov

22 Special Agent Ben-Meir is the Law Enforcement Point of Contact regarding the victim
23 of the Jenny Series, Case No. DT07QR07DT0020. He is familiar with the images/videos in this series
24 and able to verify Jenny's identity and age.

25 **D. Detective Daniel Fandrey**
26 Agency: Suffolk County Police Department
27 Email: daniel.fandrey@suffolkcountyny.gov

28 and

Detective Rory Forrestal - retired

Suffolk County Police Department, Computer Crimes
631-852-6583

ForreRor@suffolkcountyny.gov

Detectives Fandry and Forrestal are the Law Enforcement Points of Contact regarding the victim of the Jessica Series, Case No. 01-477524. They are familiar with the images/videos in this series and able to verify Jessica's identity and age.

E. SSA J. Thomas Rothrock, retired

Formerly of Department of Homeland Security Immigrations and Customs Enforcement
j.tom.rothrock@gmail.com

Retired Supervisory Special Agent Rothrock is at this time the Law Enforcement Point of Contact regarding Maureen of the Lighthouse Series, Case No. 52F41819. SSA Rothrock was involved in the original rescue and production case related to the Lighthouse series, is familiar with the images/videos in this series and able to identify Maureen in images from the series and to verify Maureen's identity and age.

F. Detective Deborah Behymer - retired

Okanogan County Sheriff's Office
509-429-0831
debbiebehymmer@yahoo.com

Retired Detective Behymer is the Law Enforcement Point of Contact regarding Sarah of the Marineland Series. She is familiar with the images/videos in this series and able to identify Sarah in images from the series able to verify Sarah's identity and age.

G. SA Kevin Shanley

FBI
617-877-9809
Kevin.shanley@ic.fbi.gov

1 Special Agent Shanley is the Law Enforcement Point of Contact regarding Amy of the Misty
2 Series. He is familiar with the images/videos in this series and able to identify Amy in images from
3 the series and able to verify her identity and age.
4

5 **H. SA Jamie West**

6 Department of Homeland Security Immigration and Customs Enforcement
7 802-873-3277
8 Jamie.west@dhs.gov
9 Case No. NT07QS12NT0002

10 And/or

11 **Detective Sergeant John Merrigan**

12 Vermont State Police – Rockingham Barracks
13 802-522-7252
14 John.merrigan@state.vt.us
15 Case No. 12D100066

16 Special Agent West and/or Detective Sergeant John Merrigan are the Law Enforcement Points
17 of Contact regarding Erika and Tori of the PinkHeartSisters Series. SA West and Detective Sergeant
18 Merrigan are familiar with the images/videos in this series, able to identify Erika and Tori in images
19 from the series, and able to verify their identities and ages.
20

21 **I. Corporal Amanda Garner**

22 **Corporal Adelle Brown**
23 **Constable Lana Chui**
24 **Sergeant Natalie Davis**
25 **E Division Major Crime Section**
26 **Royal Canadian Mounted Police**
27 **Mailstop #209**
28 **14200 Green Timbers Way**
Surrey, BC. V3T 6P3
Canada
Amanda.garner@rcmp-grc.gc.ca
Adelle.brown@rcmp-grc.gc.ca
Lana.chui@rcmp-grc.gc.ca
Natalie.davis@rcmp-grp.gc.ca

Or

Integrated Child Exploitation
Victim Identification Unit
Phone: 778-290-3930
Email: ICE_BC_VI@rcmp-grc.gc.ca

Corporals Garner and Brown, Constable Chui, and Sgt. Natalie Davis or the Victim Identification Unit of the Integrated Child Exploitation Unit of the Royal Canadian Mounted Police are the Law Enforcement Points of Contact regarding Pia and Mya of the Sweet Sugar Series. They are familiar with the images/videos in this series, and able to identify Pia and Mya in images from the series, and able to verify Pia's and Mya's identities and ages.

And

Sgt. Bev Csikos – former LEPOC
Royal Canadian Mounted Police
604-598-4349
Bev.csikos@rcmp-grc.gc.ca
Case No. 2010-690

Sgt. Csikos of the Royal Canadian Mounted Police is the former Law Enforcement Point of Contact regarding Pia and Mya of the Sweet Sugar Series. She is familiar with the images/videos in this series and able to verify their identities and ages.

J. SSA Joshua Findley
Department of Homeland Security Immigration and Customs Enforcement
503-326-7491
Joshua.s.findley@dhs.gov

And

Detective Roy Shepherd, retired
Richland Police Department
509-554-3613
Roy.shepherd31@gmail.com

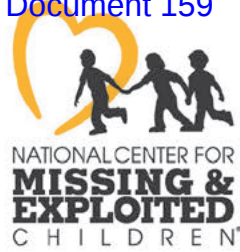
Supervisory Special Agent Joshua Findley or Retired Detective Roy Shepherd are the Law Enforcement Points of Contact regarding Lily of the Vicky Series. SSA Findley and Detective Shepherd are able to identify Lily in images from the series, and to verify her identity and age.

1
2 Dated this 30th day of November, 2020.

3 /s/ John A. Kawai
4 John A. Kawai, CSBN 260120
5 CARPENTER, ZUCKERMAN & ROWLEY
6 407 Bryant Circle, Suite F
7 Ojai, CA 93023
8 Phone: 805-272-4001
9 Email: jk@czrlaw.com
10 Attorney for Plaintiffs

11 /s/ Carol L. Hepburn
12 Carol L. Hepburn, *Pro Hac Vice Admitted*
13 CAROL L. HEPBURN, P.S.
14 200 First Ave. West, Suite 550
15 Seattle, WA 98119
16 Phone: 206-957-7272
17 Email: carol@hepburnlaw.net
18 Attorney for Plaintiffs Maureen,
19 Pia, Ava, Lily, Sarah, Skylar, Savannah,
20 Sally, Sierra, Violet, Amy, Erika, Tori, Jenny and Jessica

21 /s/ Deborah A. Bianco
22 Deborah A. Bianco, *Pro Hac Vice Admitted*
23 DEBORAH A. BIANCO, PLLC
24 14535 Bel-Red Road, #201
25 Bellevue, WA 98007
26 Phone: 425-747-4500
27 Email: deb@debbiancolaw.com
28 Attorney for Plaintiffs Maureen, Pia and
Mya



ATTORNEY SERIES INFORMATION REPORT

Series: At School

CHILD INFORMATION

Child's date of birth: [REDACTED]

Child's gender: Female

Child's age at time of production of images: 4-7

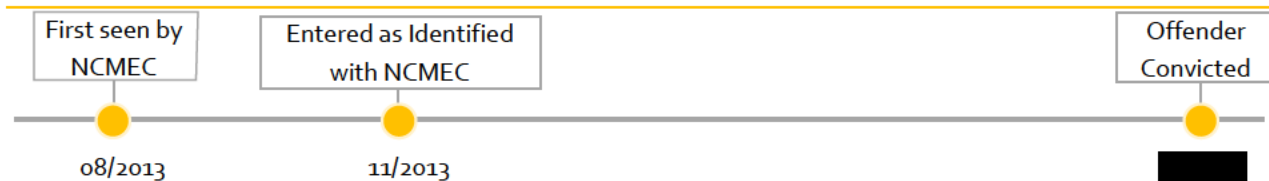
Producing offender's relationship to child: [REDACTED]

Victim Impact Statement on file: Yes, all jurisdictions

File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

CASE SUMMARY

In the summer of 2013, [REDACTED] and [REDACTED] investigators identified images and videos relating to this series. They determined that the metadata from these files corresponded to an elementary school in [REDACTED] and a residential address in [REDACTED]. This information was provided to U.S. investigators, who identified [REDACTED] as being connected to the [REDACTED] address and to having recently moved to [REDACTED]. Law

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

enforcement also established that [REDACTED] had a young [REDACTED] at [REDACTED] Elementary School, where he had served as [REDACTED]. Law enforcement also learned that [REDACTED] had a previous arrest for lewd or lascivious act with a child under 14 and indecent exposure, though these charges were dismissed, and that [REDACTED]'s Facebook page featured a profile photo that appeared to show the same young girl pictured in the series files. [REDACTED] was arrested on August 26, [REDACTED] on charges of production, distribution, and possession of child pornography. On September 8, [REDACTED], he pled guilty to these charges and was sentenced to serve 23 years in prison. The court ordered [REDACTED] to pay \$[REDACTED] in restitution to the young girl in the series.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series name: [REDACTED]
 Relationship of Associated Victim to Offender: Victim was [REDACTED] of At School offender
 Distribution of Associated Series Files: None
 Legal Counsel Retained by Associated Victim: No

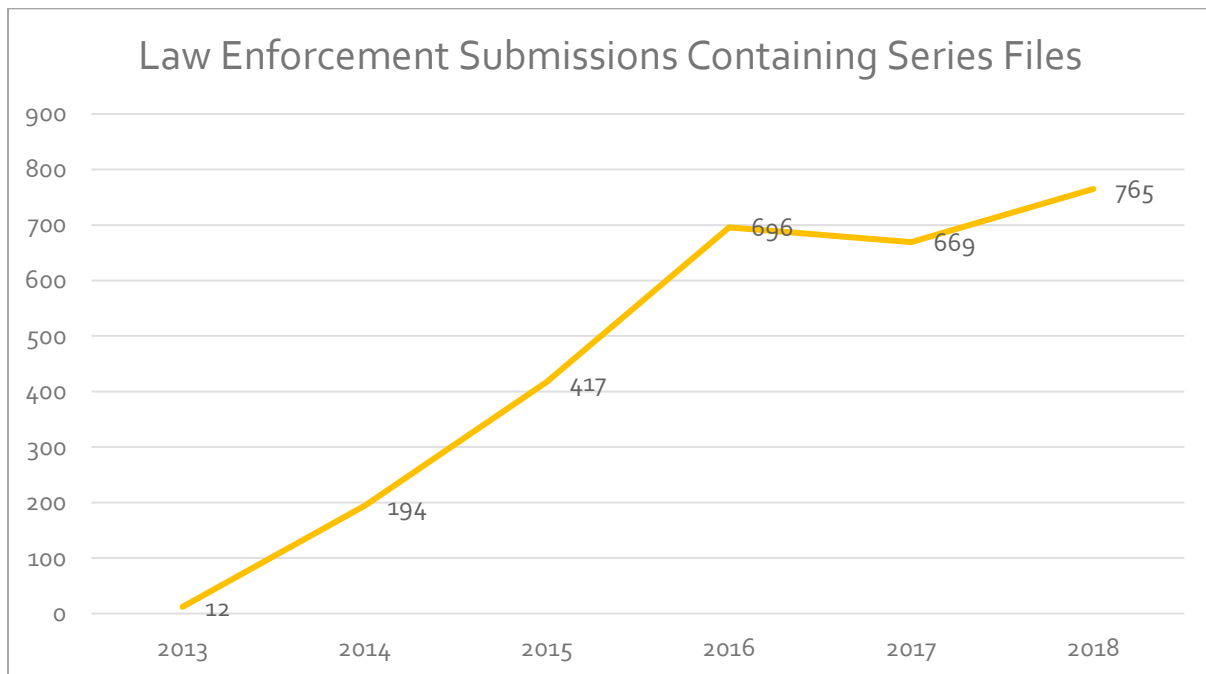
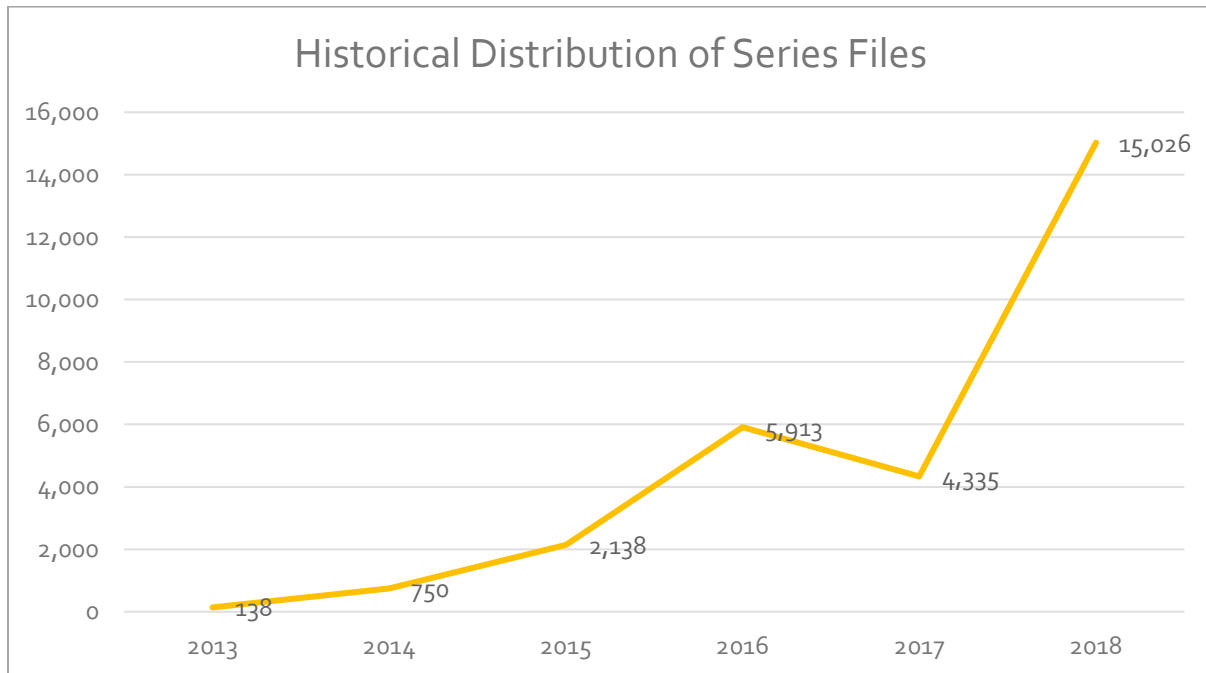
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 62 (50 images and 12 videos)

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From August 2, 2013 through December 31, 2018, files from the "At School" series have been included in 2,749 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 28,280 files from the "At School" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



15,026 series files submitted to NCMEC



765 law enforcement cases submitted to NCMEC containing series files



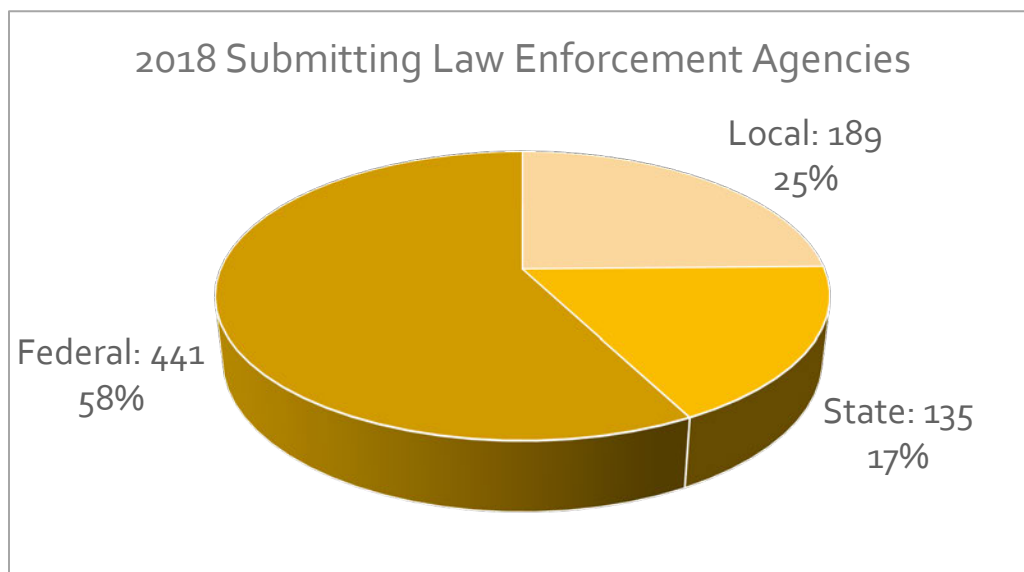
708 offenders possessing files from this series in cases submitted to NCMEC



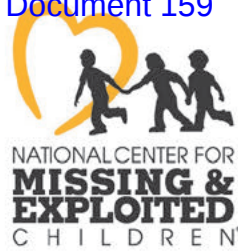
883 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

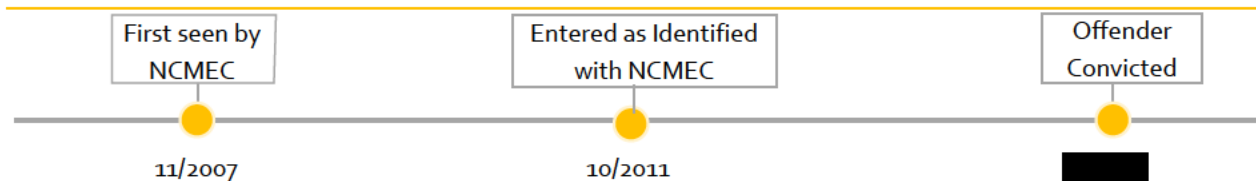
Series: Jan_Socks1

CHILD INFORMATION

Child's date of birth: [REDACTED]
 Child's gender: Female
 Child's age at time of production of images: 6-10
 Producing offender's relationship to child: [REDACTED]
 Victim Impact Statement on file: Yes, all jurisdictions
 File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

CASE SUMMARY

I Between September 2006 and December 2009, [REDACTED] produced over 50 images of child pornography on five separate occasions. On August 16, 2011 and charged with 5 counts of production of child pornography and 1 count of transportation of child pornography.

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

During the course of the prosecution, the government identified at least six additional producers of child pornography and were able to rescue approximately 35 additional child victims of ongoing sexual abuse who were depicted in images of child pornography. At the time of [REDACTED]'s arrest, agents and officers rescued the child victim [REDACTED] used to produce child pornography.

[REDACTED] pled guilty to all counts on [REDACTED]. He was sentenced on October 4, 2012 to 40 years in prison.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series name: Jan_Socks2, Jan_Socks3, Jan_Socks4

Relationship of Associated Victim to Offender: [REDACTED]

Distribution of Associated Series Files: All distributed

Legal Counsel Retained by Associated Victim: All represented by Carol Hepburn

POINT OF CONTACT

Name: SA Adam Krob or SA Allison Hirsch

Agency: Federal Bureau of Investigation

Email: alkrob@fbi.gov or alhirsch2@fbi.gov

Phone Number: 303-629-7171

Case Number: 305A-DN-64933

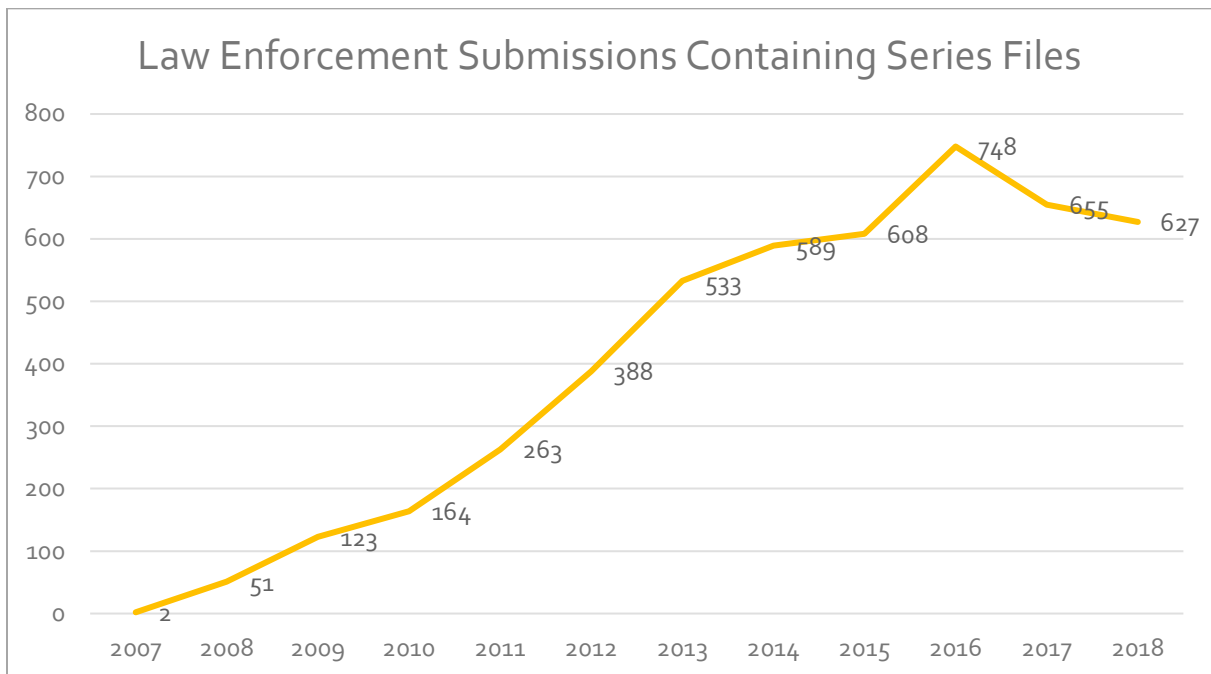
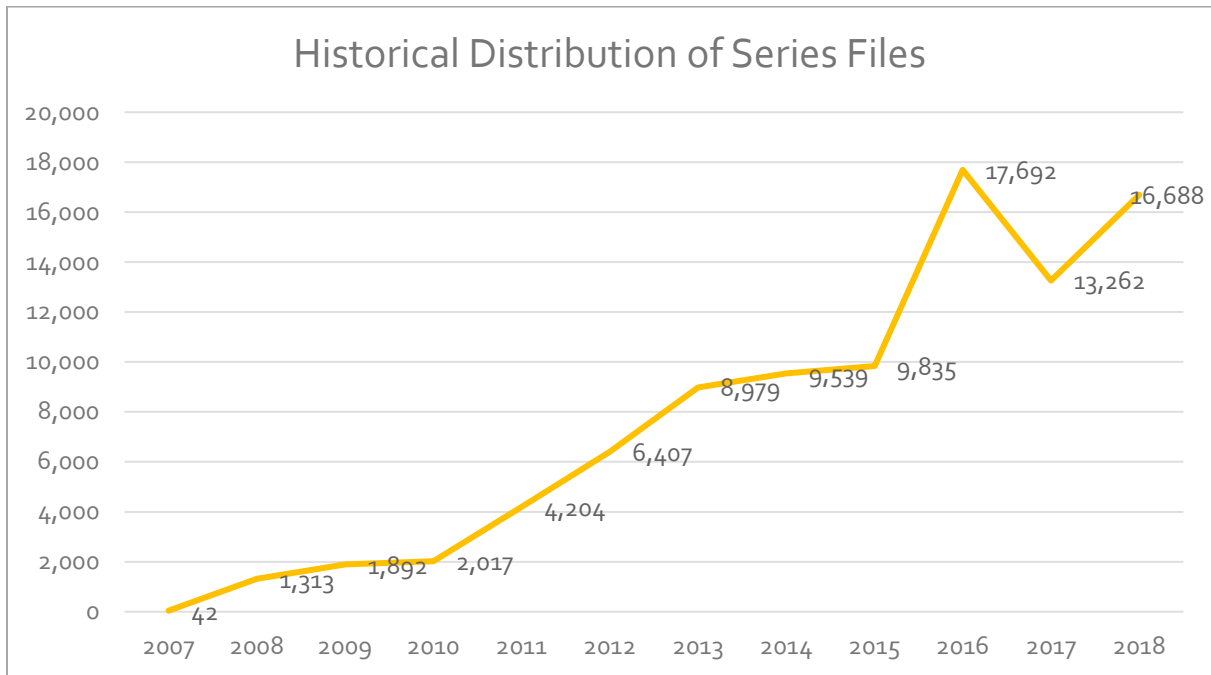
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 1,096 (1,050 images and 46 videos)

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From November 30, 2007 through December 31, 2018, files from the "Jan_Socks1" series have been included in 4,753 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 91,846 files from the "Jan_Socks1" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



16,688 series files submitted to NCMEC



627 law enforcement cases submitted to NCMEC containing series files



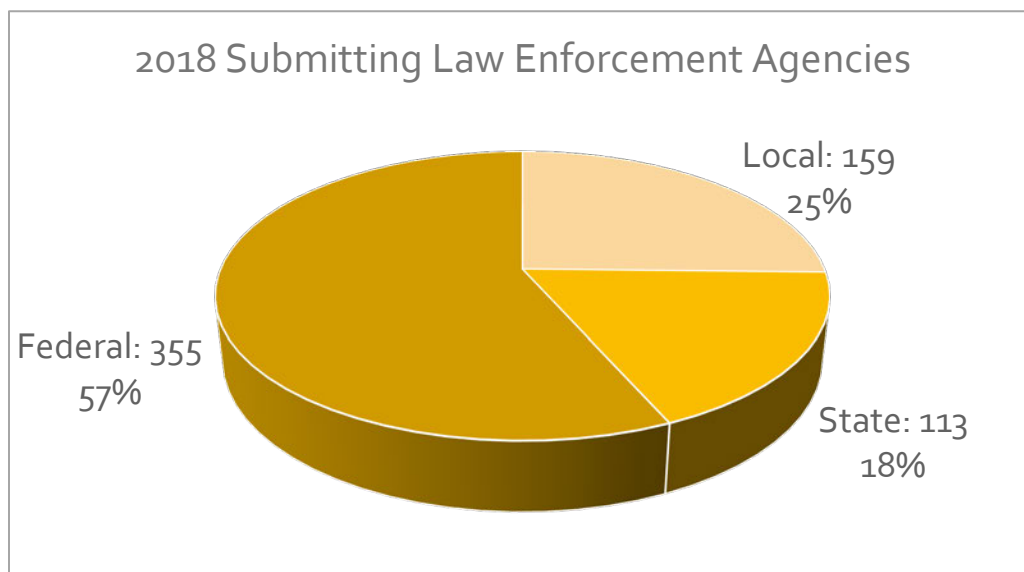
602 offenders possessing files from this series in cases submitted to NCMEC



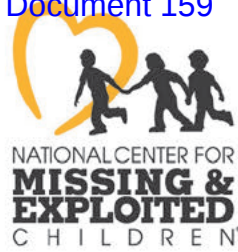
335 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

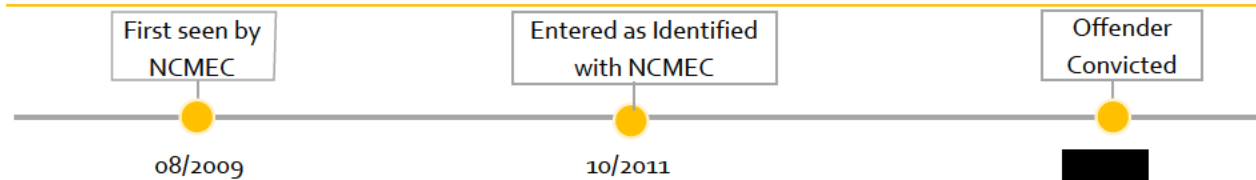
Series: Jan_Socks2

CHILD INFORMATION

Child's date of birth: [REDACTED]
 Child's gender: Female
 Child's age at time of production of images: 4
 Producing offender's relationship to child: [REDACTED]
 Victim Impact Statement on file: Yes, all jurisdictions
 File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

CASE SUMMARY

Between September 2006 and December 2009, [REDACTED] produced over 50 images of child pornography on five separate occasions. On August 16, 2011 and charged with 5 counts of production of child pornography and 1 count of transportation of child pornography. During the course of the prosecution, the government identified at least six additional producers of child pornography and were able to rescue approximately 35 additional child victims of ongoing sexual abuse who were

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

depicted in images of child pornography. At the time of [REDACTED]'s arrest, agents and officers rescued the child victim [REDACTED] used to produce child pornography.

[REDACTED] pled guilty to all counts on [REDACTED]. He was sentenced on October 4, 2012 to 40 years in prison.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series name: Jan_Socks1, Jan_Socks3, Jan_Socks4

Relationship of Associated Victim to Offender: [REDACTED]

Distribution of Associated Series Files: All distributed

Legal Counsel Retained by Associated Victim: All represented by Carol Hepburn

POINT OF CONTACT

Name: SA Adam Krob or SA Allison Hirsch

Agency: Federal Bureau of Investigation

Email: alkrob@fbi.gov or alhirsch2@fbi.gov

Phone Number: 303-629-7171

Case Number: 305A-DN-64933

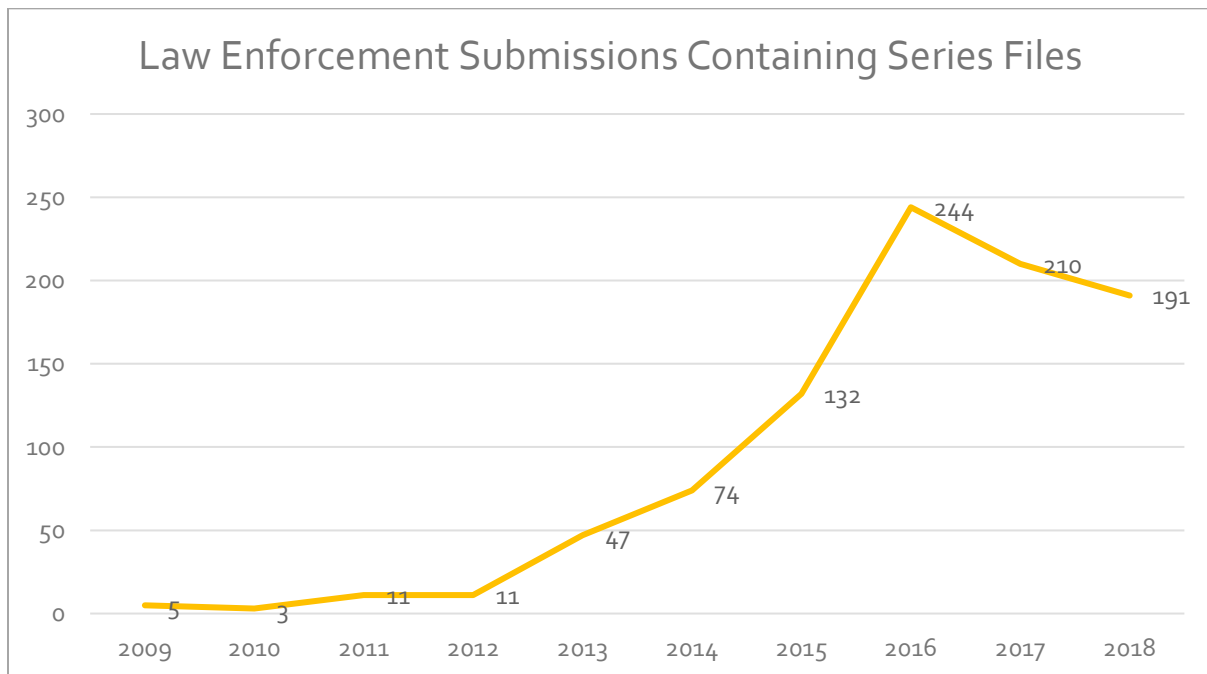
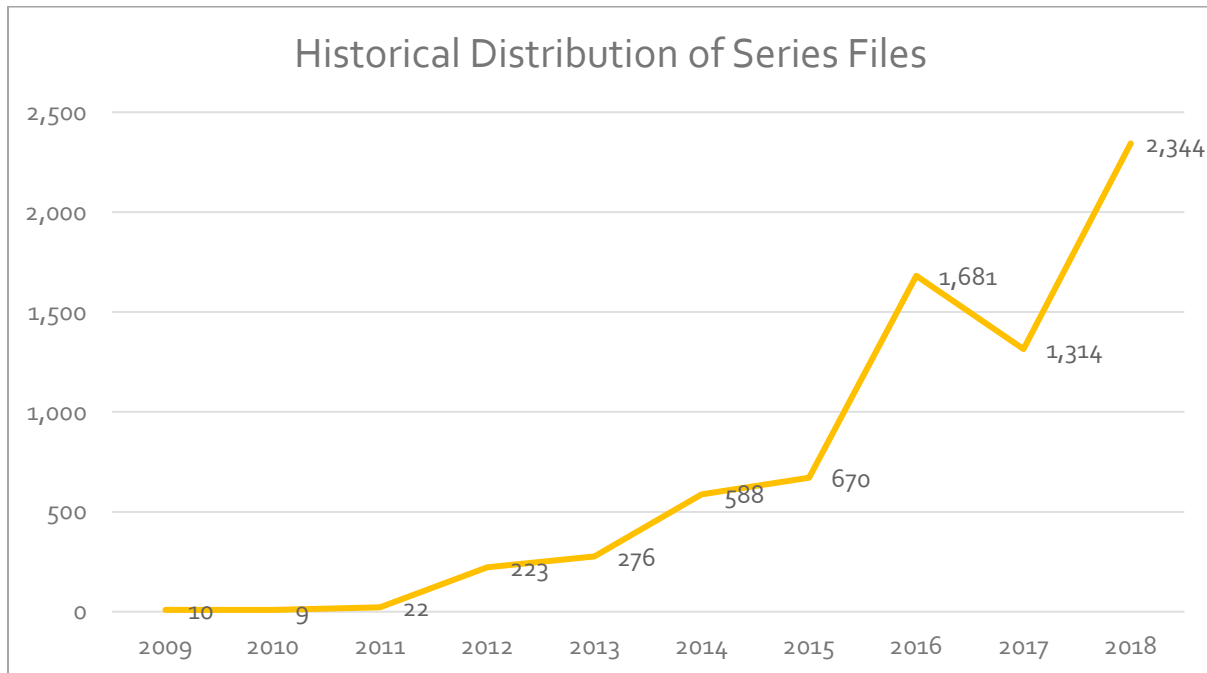
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 199 (194 images and 5 videos)

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From August 13, 2009 through December 31, 2018, files from the "Jan_Socks2" series have been included in 928 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 7,131 files from the "Jan_Socks2" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



2,344 series files submitted to NCMEC



191 law enforcement cases submitted to NCMEC containing series files



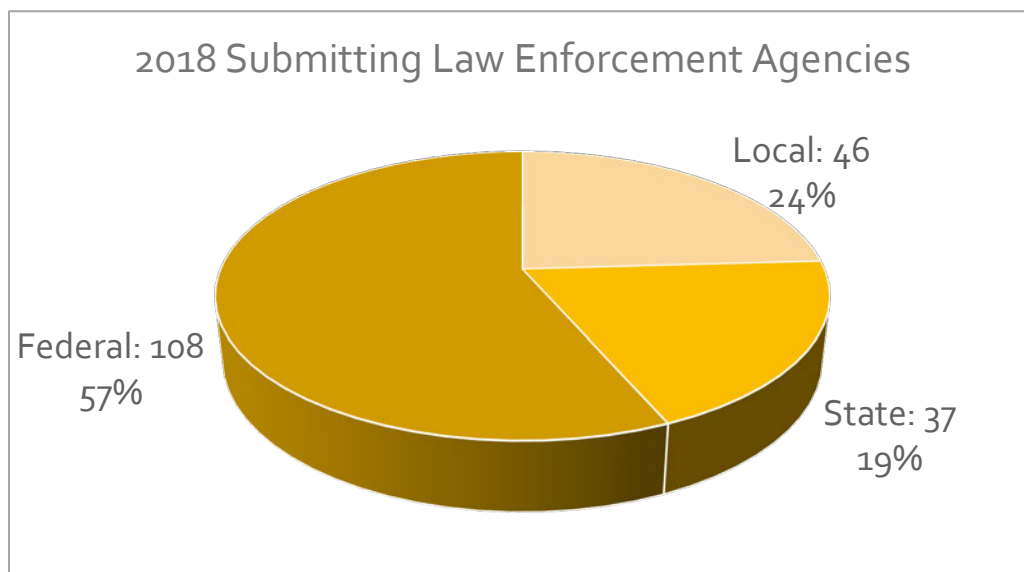
184 offenders possessing files from this series in cases submitted to NCMEC



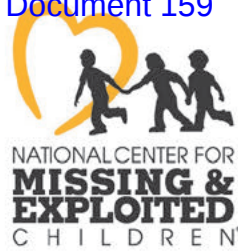
38 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

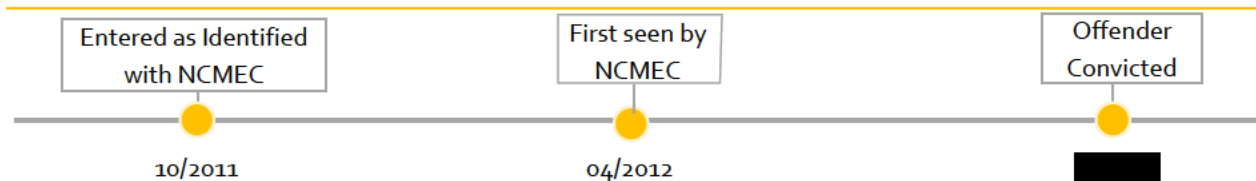
Series: Jan_Socks3

CHILD INFORMATION

Child's date of birth: [REDACTED]
 Child's gender: Female
 Child's age at time of production of images: 2-5
 Producing offender's relationship to child: [REDACTED]
 Victim Impact Statement on file: Yes, all jurisdictions
 File Type: Images

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

CASE SUMMARY

Between September 2006 and December 2009, [REDACTED] produced over 50 images of child pornography on five separate occasions. On August 16, 2011 and charged with 5 counts of production of child pornography and 1 count of transportation of child pornography.

During the course of the prosecution, the government identified at least six additional producers of child pornography and were able to rescue approximately 35 additional child victims of ongoing sexual abuse who were depicted in images of child pornography. At the time of [REDACTED]'s arrest, agents and officers rescued the child victim [REDACTED] used to produce child pornography.

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

Mueller pled guilty to all counts on July 9, 2012. He was sentenced on October 4, 2012 to 40 years in prison.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series name: Jan_Socks1, Jan_Socks2, Jan_Socks4

Relationship of Associated Victim to Offender: [REDACTED]

Distribution of Associated Series Files: All distributed

Legal Counsel Retained by Associated Victim: All represented by Carol Hepburn

POINT OF CONTACT

Name: SA Adam Krob or SA Allison Hirsch

Agency: Federal Bureau of Investigation

Email: alkrob@fbi.gov or alhirsch2@fbi.gov

Phone Number: 303-629-7171

Case Number: 305A-DN-64933

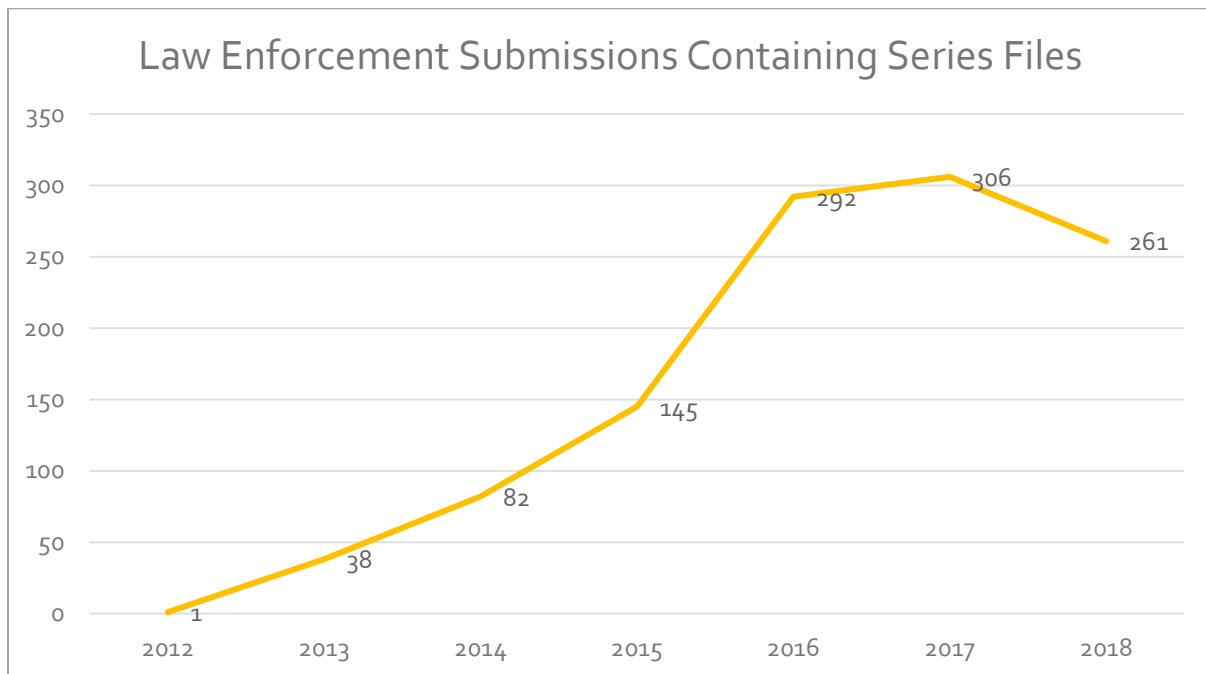
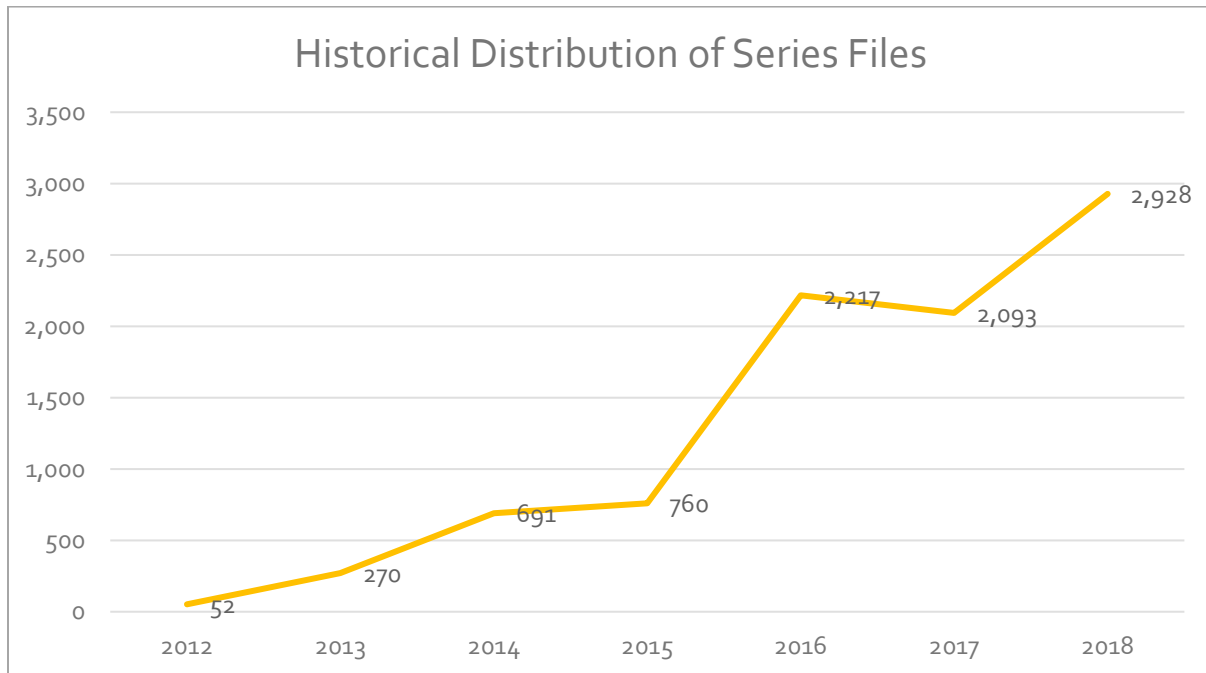
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 52 images

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From April 30, 2012 through December 31, 2018, files from the "Jan_Socks3" series have been included in 1,253 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 10,391 files from the "Jan_Socks3" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



2,982 series files submitted to NCMEC



261 law enforcement cases submitted to NCMEC containing series files



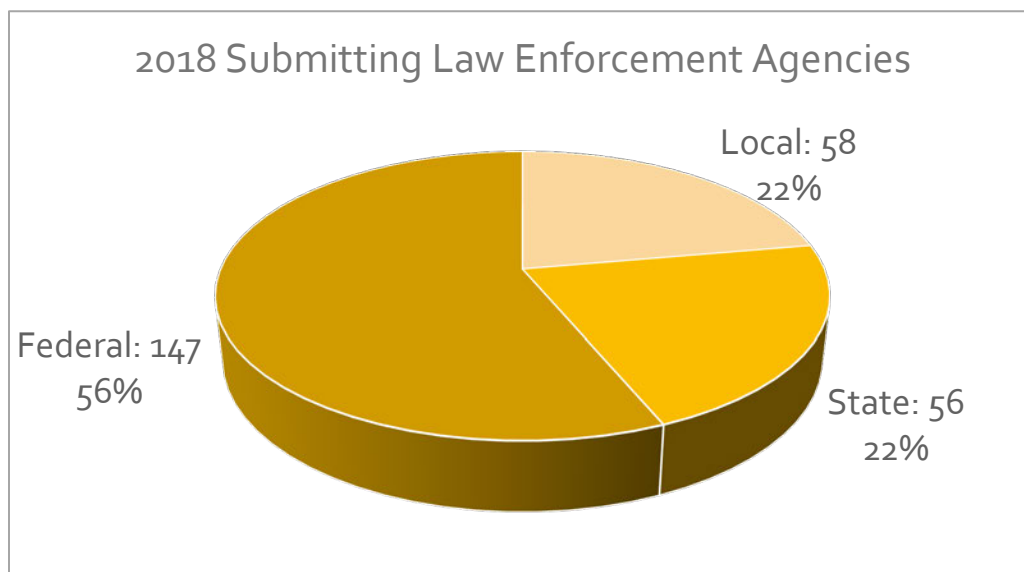
252 offenders possessing files from this series in cases submitted to NCMEC



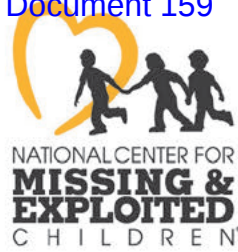
107 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

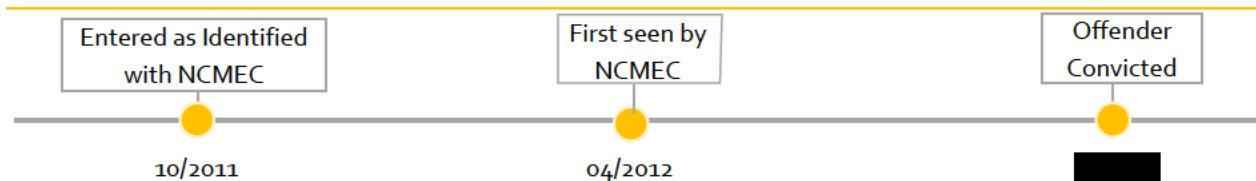
Series: Jan_Socks4

CHILD INFORMATION

Child's date of birth: [REDACTED]
 Child's gender: Female
 Child's age at time of production of images: 3
 Producing offender's relationship to child: [REDACTED]
 Victim Impact Statement on file: Yes, all jurisdictions
 File Type: Images

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

CASE SUMMARY

Between September 2006 and December 2009, [REDACTED] produced over 50 images of child pornography on five separate occasions. On August 16, 2011 and charged with 5 counts of production of child pornography and 1 count of transportation of child pornography.

During the course of the prosecution, the government identified at least six additional producers of child pornography and were able to rescue approximately 35 additional child victims of ongoing sexual abuse who were depicted in images of child pornography. At the time of [REDACTED]'s arrest, agents and officers rescued the child victim [REDACTED] used to produce child pornography.

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

Mueller pled guilty to all counts on July 9, 2012. He was sentenced on October 4, 2012 to 40 years in prison.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series name: Jan_Socks1, Jan_Socks2, Jan_Socks3

Relationship of Associated Victim to Offender: [REDACTED]

Distribution of Associated Series Files: All distributed

Legal Counsel Retained by Associated Victim: All represented by Carol Hepburn

POINT OF CONTACT

Name: SA Adam Krob or SA Allison Hirsch

Agency: Federal Bureau of Investigation

Email: alkrob@fbi.gov or alhirsch2@fbi.gov

Phone Number: 303-629-7171

Case Number: 305A-DN-64933

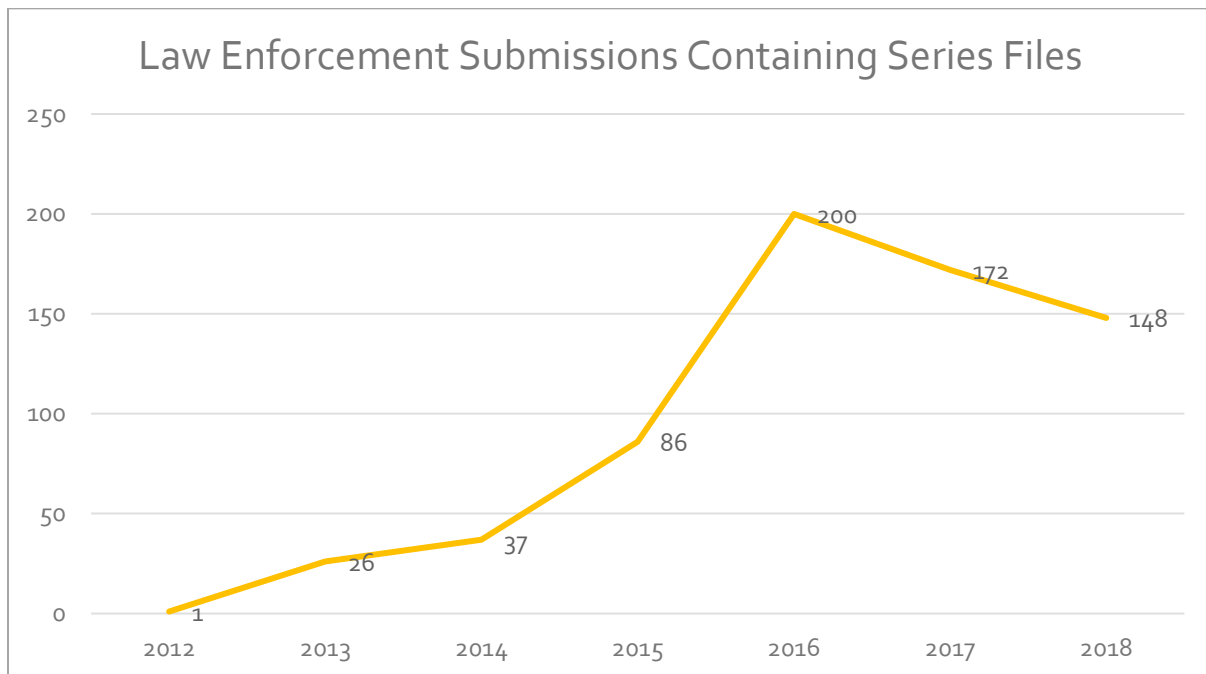
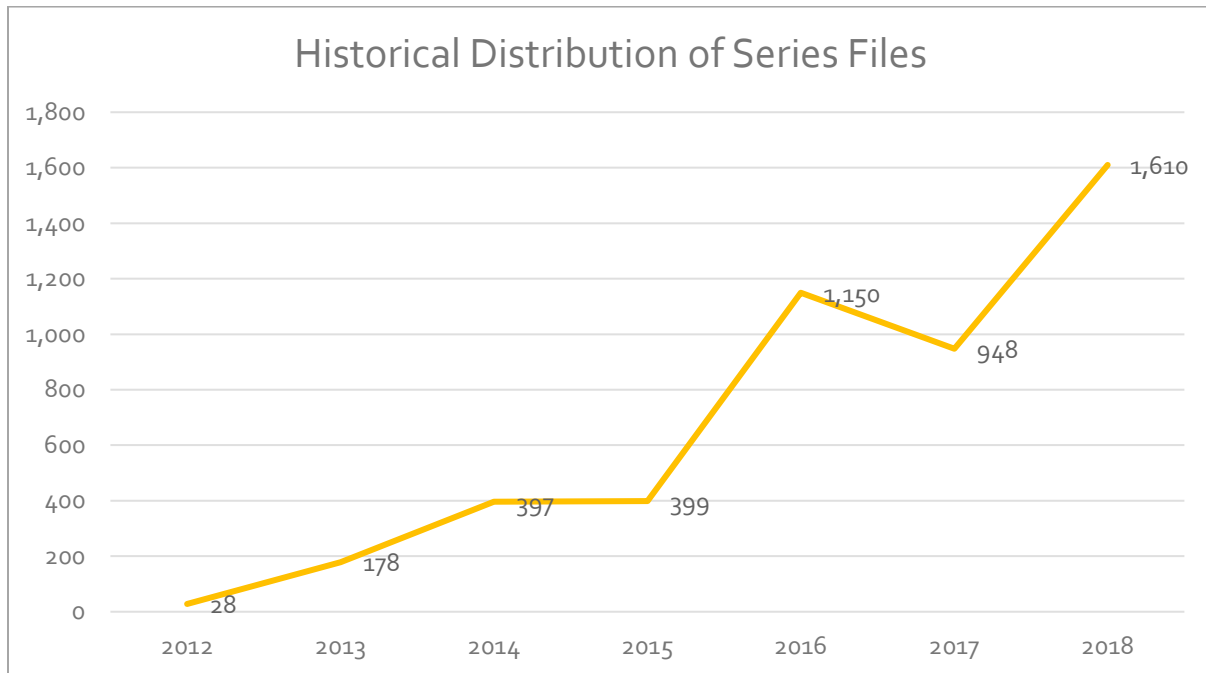
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 28 images

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From April 30, 2012 through December 31, 2018, files from the "Jan_Socks4" series have been included in 753 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 5,501 files from the "Jan_Socks4" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



1,610 series files submitted to NCMEC



148 law enforcement cases submitted to NCMEC containing series files



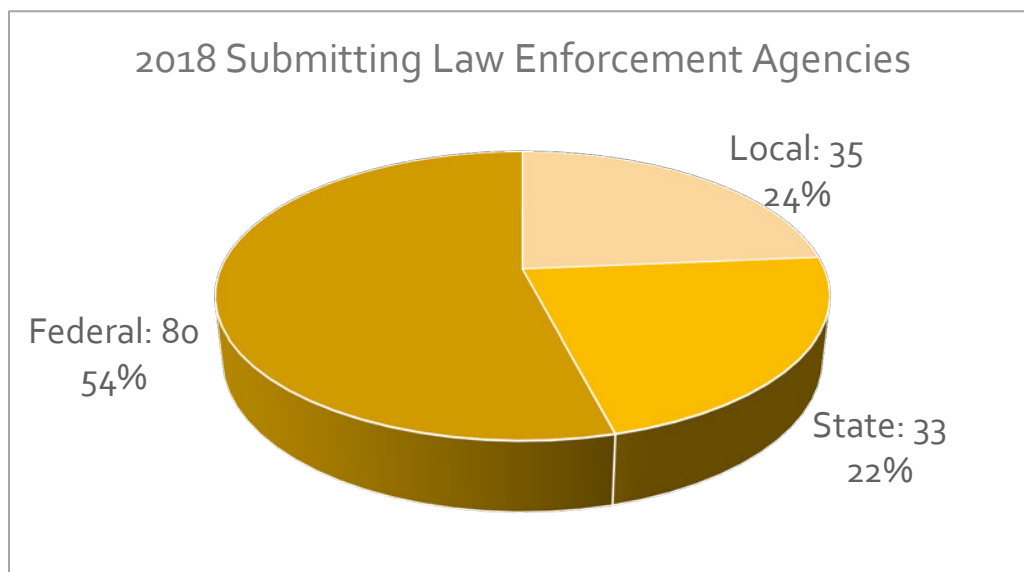
143 offenders possessing files from this series in cases submitted to NCMEC



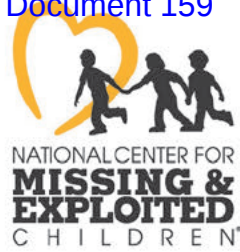
107 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

Series: Jenny

CHILD INFORMATION

Child's gender: Female

Child's age at time of production of images: 5-6

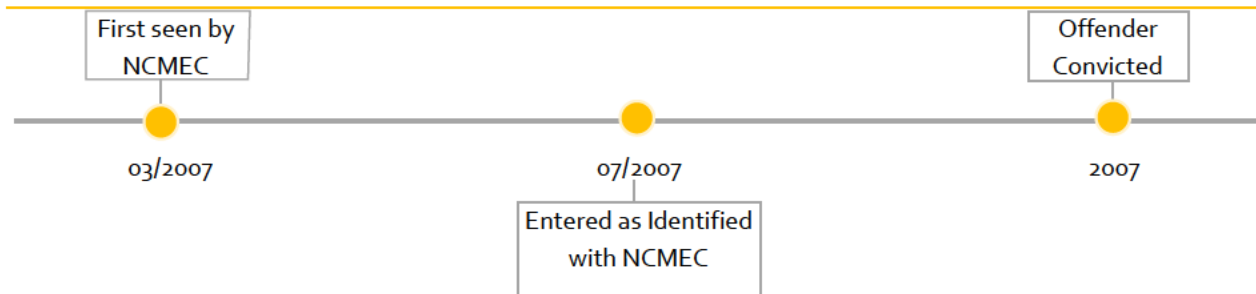
Producing offender's relationship to child: Guardian's Partner

Victim Impact Statement on file: Yes, all jurisdictions

File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

CASE SUMMARY

In January 2007, ICE began investigating a tip regarding sexual abuse images that were circulating online of an unidentified female child. During the course of their investigation, ICE arrested [REDACTED] and seized about 600 child pornography files from him, including images of [REDACTED] repeatedly sexually assaulting the 9-year old daughter of his girlfriend between January and May 2007. [REDACTED], an Iraq war veteran and former reserve officer with the Sheriff's Department, pleaded guilty in late 2007, to one state charge of first-degree criminal sexual conduct and four federal charges of child sexual exploitation and distribution, receipt and possession of child pornography. On February 25, 2008, he was sentenced to serve 30 years in federal prison, to be followed by an additional 30-60 year sentence in state prison. As recently as October 2018, [REDACTED] has been submitting FOIA requests for documentary proof that the AUSA who prosecuted him took an oath of office, and has made other pro se filings challenging his conviction.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

None.

POINT OF CONTACT

Name: SA Daniel Ben-Meir

Agency: DHS Immigration and Customs Enforcement

Email: MeirDaniel.Ben-Meir@ice.dhs.gov

Phone Number: 415-596-3762

Case Number: DT07QR07DT0020

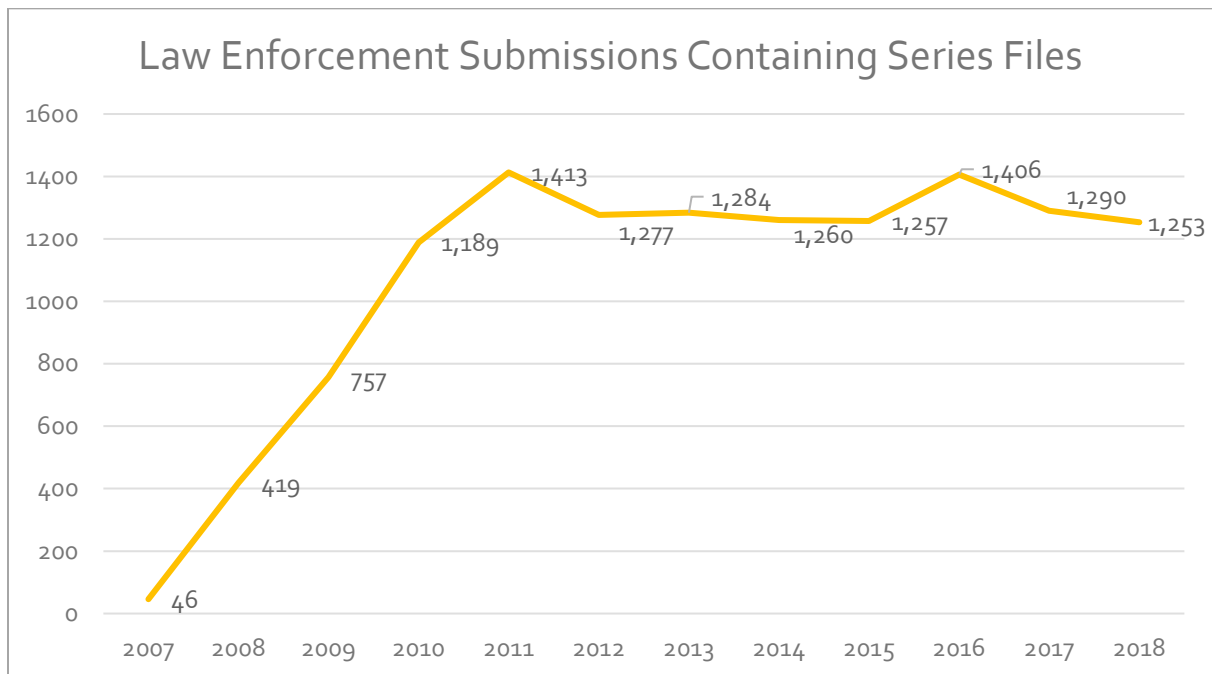
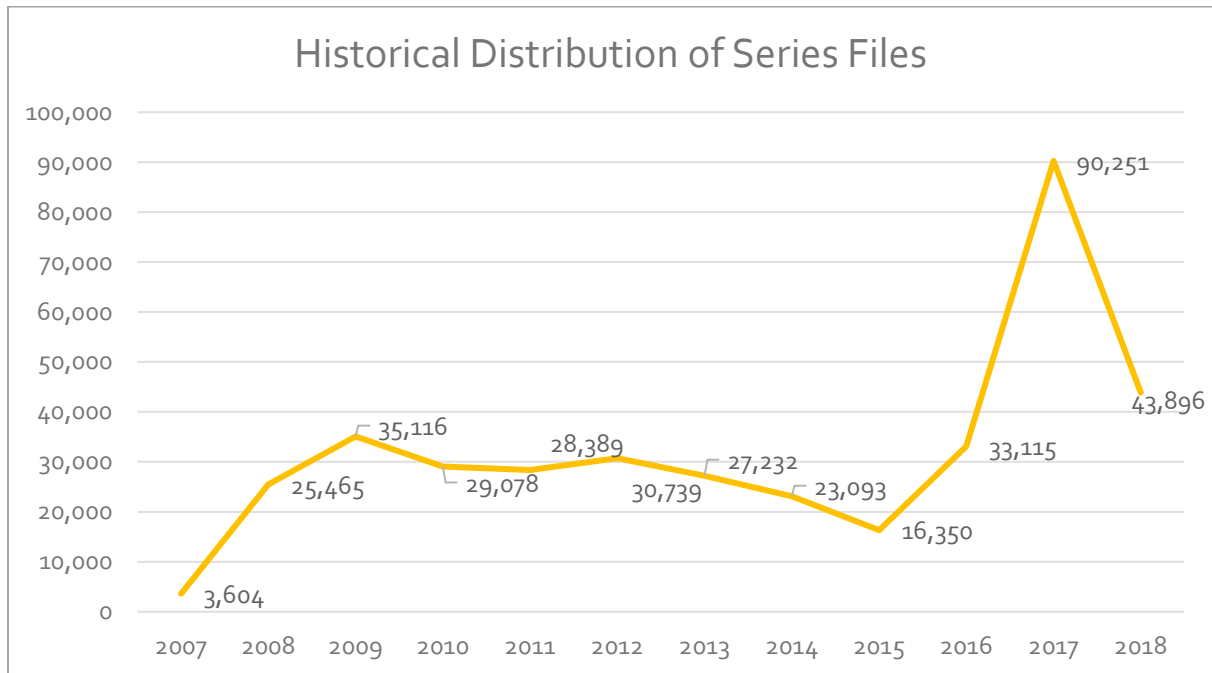
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 94 (69 images and 25 videos)

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From March 23, 2007 through December 31, 2018, files from the "Jenny" series have been included in 12,850 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 385,866 files from the "Jenny" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



43,896 series files submitted to NCMEC



1,253 law enforcement cases submitted to NCMEC containing series files



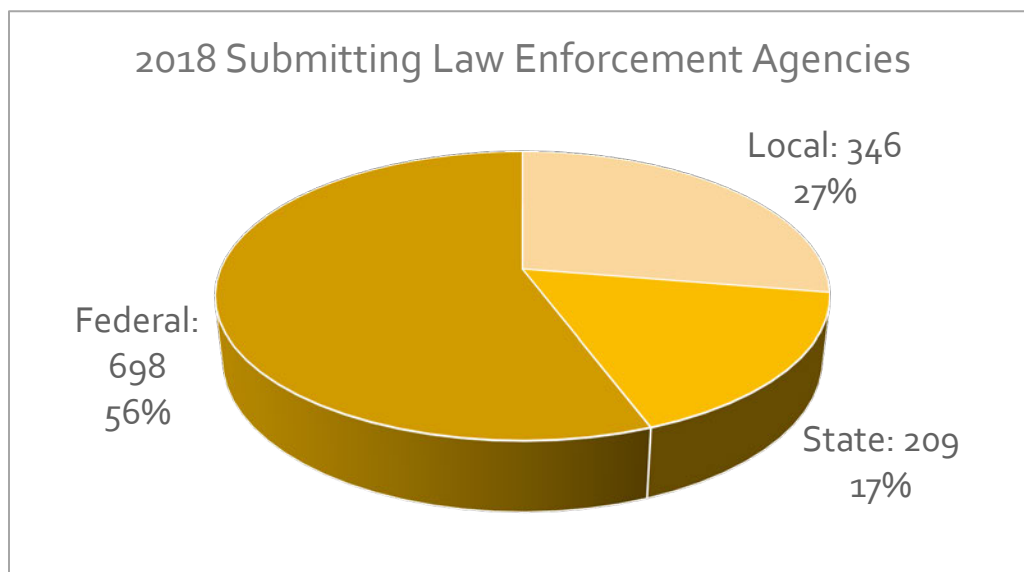
1,176 offenders possessing files from this series in cases submitted to NCMEC



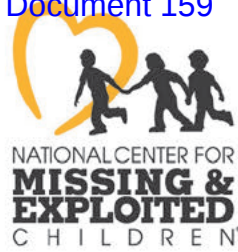
1,419 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

Series: Jessica

CHILD INFORMATION

Child's date of birth: [REDACTED]

Child's gender: Female

Child's age at time of production of images: 1-4

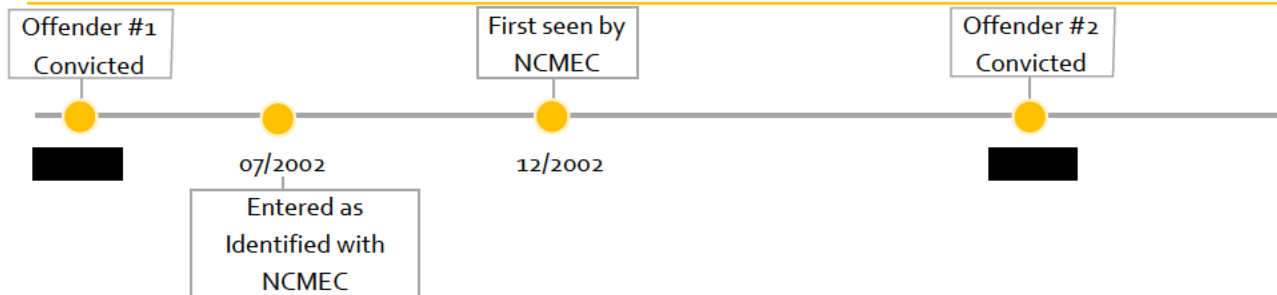
Producing offender's relationship to child: [REDACTED]; Family friend - [REDACTED]

Victim Impact Statement on file: Yes, all jurisdictions

File Type: Images

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CASE SUMMARY

In September 2001, law enforcement went to [REDACTED]'s home in response to a complaint of child sexual abuse. Law enforcement seized [REDACTED]'s computer and found images of child pornography including images of [REDACTED] sexually abusing his daughter who was one to two years old at the time.

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

Information from ██████ discovered on his computer showed that ██████ had chatted and traded images with ██████. ██████ had invited ██████ to his residence for ██████ to meet ██████'s daughter and exchange child pornography.

Based on this information, law enforcement arrested ██████ on September 22, 2001 and executed a search warrant on ██████'s computer and hard drives. ██████ confessed to police that he had seen pornographic images created by ██████, including images of ██████'s daughter. The search of ██████'s computer and hard drives uncovered 2,300 images and 300 videos of child pornography.

On May 31, 2002, ██████ pled guilty to five counts related to the sexual abuse of his ██████, child pornography and endangering the welfare of a child. On July 29, 2002, ██████ was sentenced to 18 years in prison.

On April 15, 2005, a jury convicted ██████ of four counts related to receiving, distributing, reproducing and possessing child pornography and one count of persuading and enticing persons under the age of 18 to engage in sexual activity. On May 27, 2015, ██████ was sentenced to 25 years in prison (after the initial sentence was vacated on appeal).

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

None.

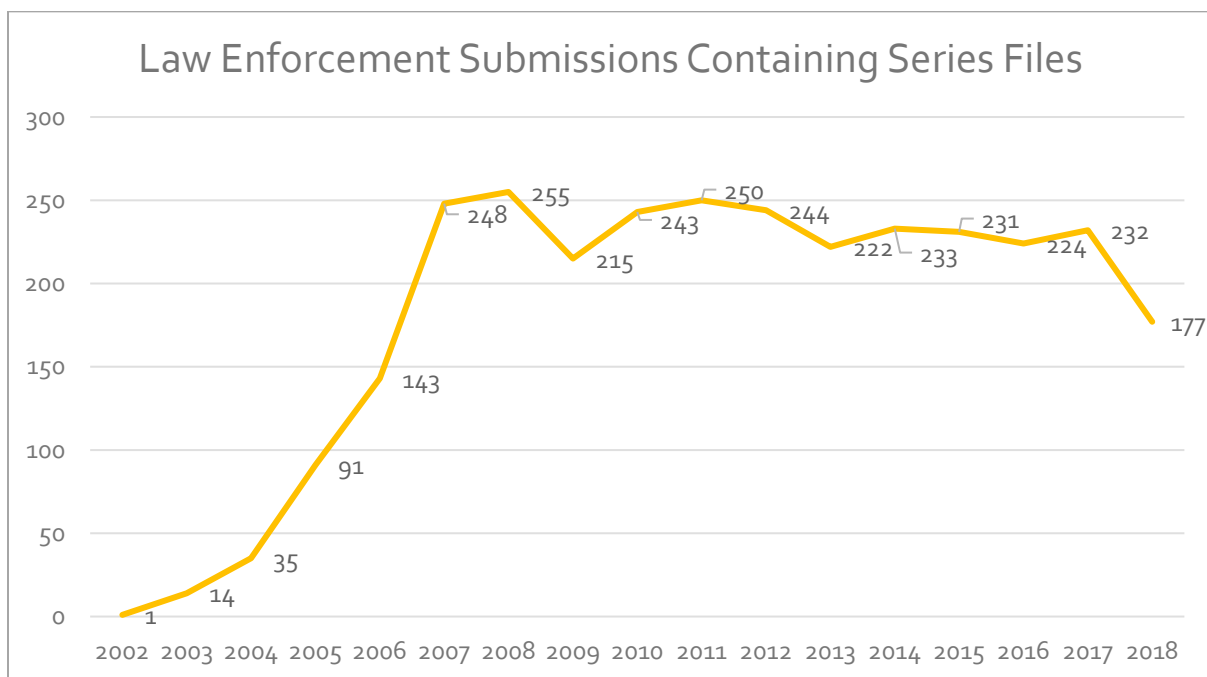
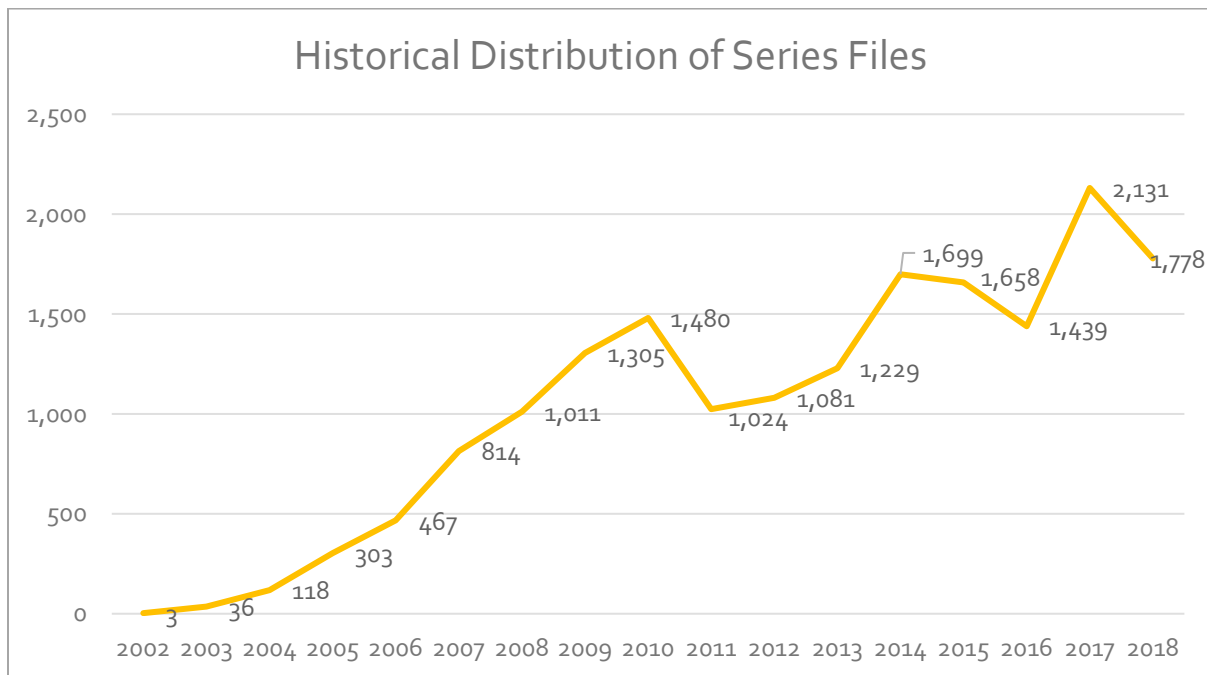
POINT OF CONTACT

Name: Detective Daniel Fandrey
Agency: Suffolk County Police Department
Email: daniel.fandrey@suffolkcountyny.gov
Phone Number: 631-655-2212
Case Number: 01-477524

DISTRIBUTION INFORMATION

From December 20, 2002 through December 31, 2018, files from the "Jessica" series have been included in 3,059 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 17,619 files from the "Jessica" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



1,778 series files submitted to NCMEC



177 law enforcement cases submitted to NCMEC containing series files



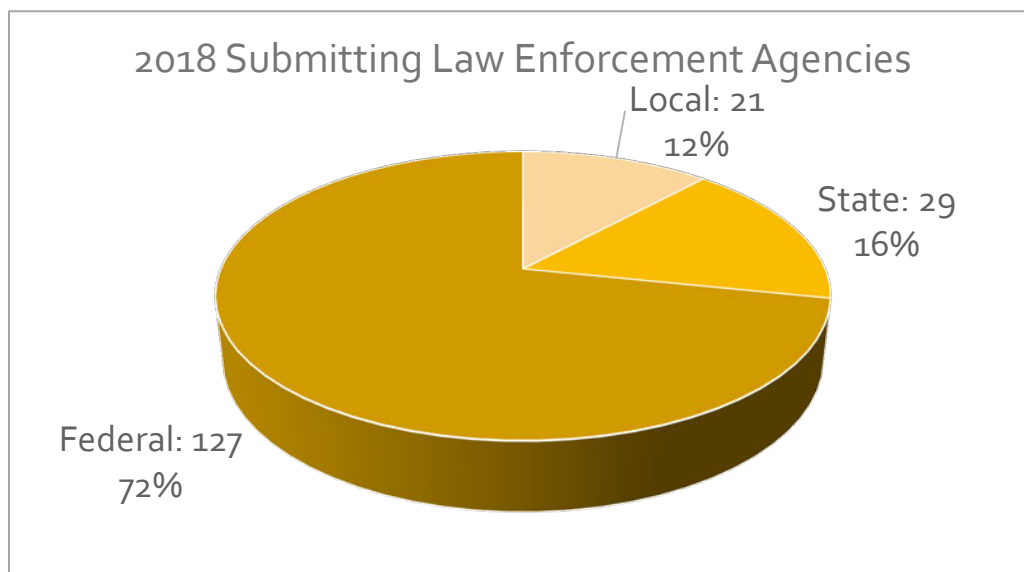
171 offenders possessing files from this series in cases submitted to NCMEC



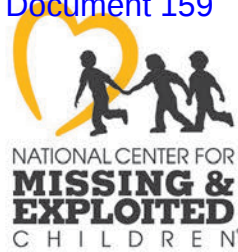
6 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

Series: Lighthouse1

CHILD INFORMATION

Child's date of birth: [REDACTED]

Child's gender: Female

Child's age at time of production of images: 8-10

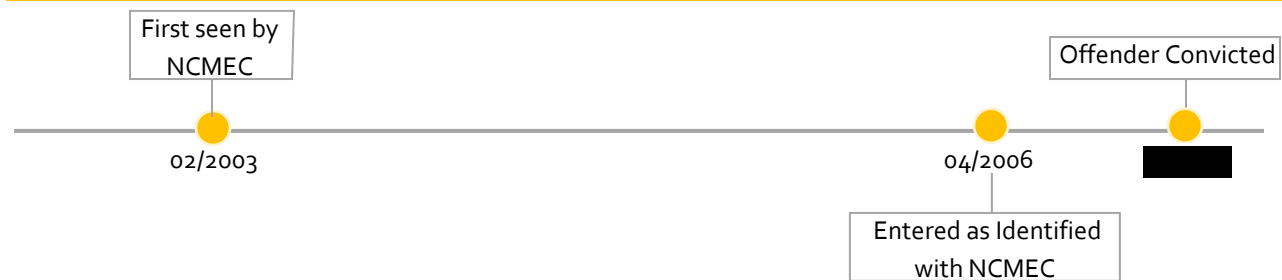
Producing offender's relationship to child: Babysitter

Victim Impact Statement on file: Yes, all jurisdictions

File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

CASE SUMMARY

NCMEC analysts reviewing content seized from an offender's computer and forwarded to NCMEC by law enforcement located several images of a prepubescent female victim. Images of this young girl had been found on several individuals' computers in files labeled with the victim's actual name. NCMEC analysts used this information to determine a possible location for the victim in [REDACTED]. Law enforcement interviewed the child who disclosed abuse by a man she called "[REDACTED]" who was a live-in babysitter for her neighbor's family. She also disclosed that "[REDACTED]" had abused two children living in the neighbor's home and that he had photographed and uploaded images of the abuse. Law enforcement arrested [REDACTED] at his home in [REDACTED] where he lived with the same family he had babysat for in [REDACTED]. [REDACTED] had been convicted in [REDACTED] in [REDACTED] for thirteen counts of rape, sodomy, and sexual abuse of female victims under the age of 12. At the time of his arrest, he was found in the basement with a toddler. [REDACTED] entered a conditional guilty and was sentenced on October 13, 2006, to two concurrent terms of life imprisonment.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series name: Lighthouse2, Lighthouse3 and Lighthouse4
 Relationship of Associated Victims to Offender: Babysitter to all victims
 Distribution of Associated Series Files: Yes
 Legal Counsel Retained by Associated Victim: Lighthouse2: No; Lighthouse3: Yes, James Marsh and Carol Hepburn; Lighthouse4: Yes, Elaine Lenahan

POINT OF CONTACT

Name: Thomas Rothrock
 Agency: DHS Immigration and Customs Enforcement
 Email: john.t.rothrock@fletc.dhs.gov
 Phone Number: 912-267-2740
 Case Number: IP07QR06IP0005

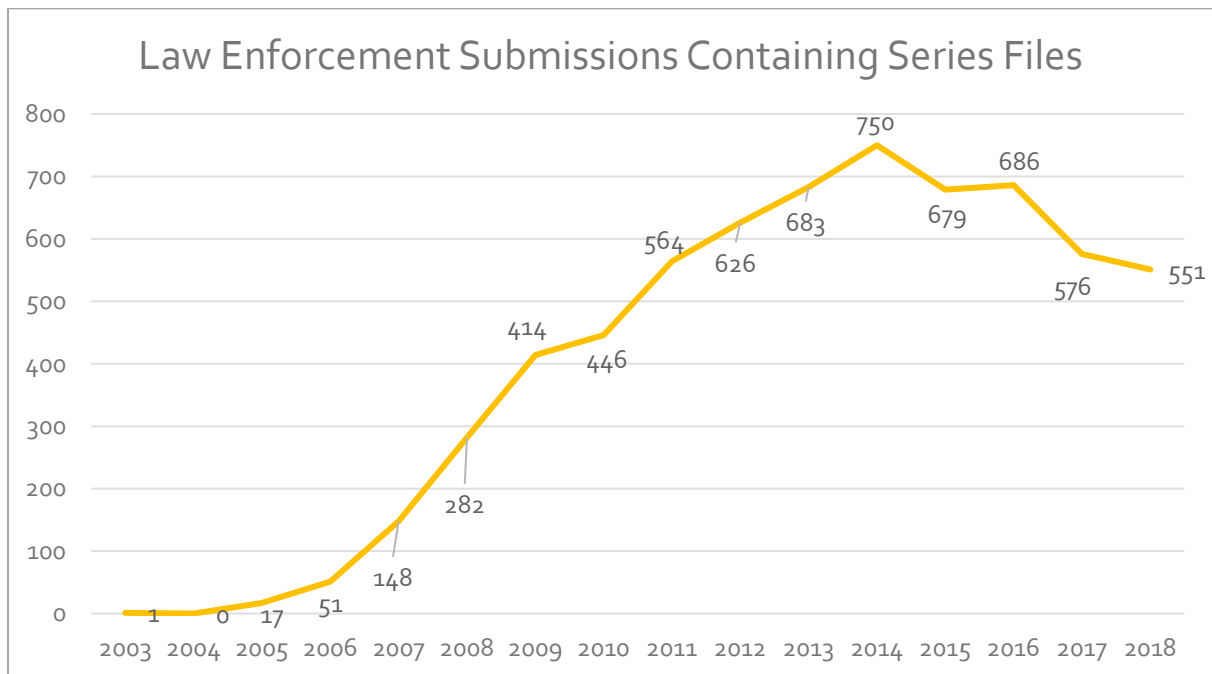
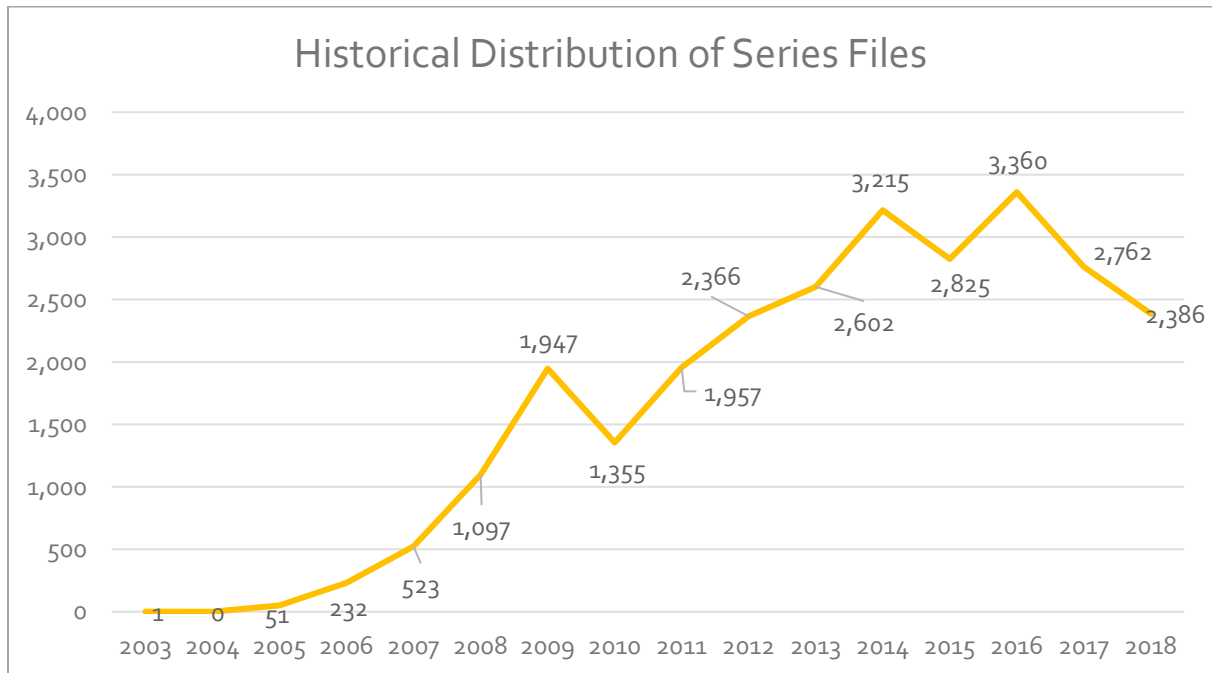
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 35 (29 images and 6 videos)

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From February 25, 2003 through December 31, 2018, files from the "Lighthouse1" series have been included in 6,471 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 26,658 files from the "Lighthouse1" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



2,386 series files submitted to NCMEC



551 law enforcement cases submitted to NCMEC containing series files



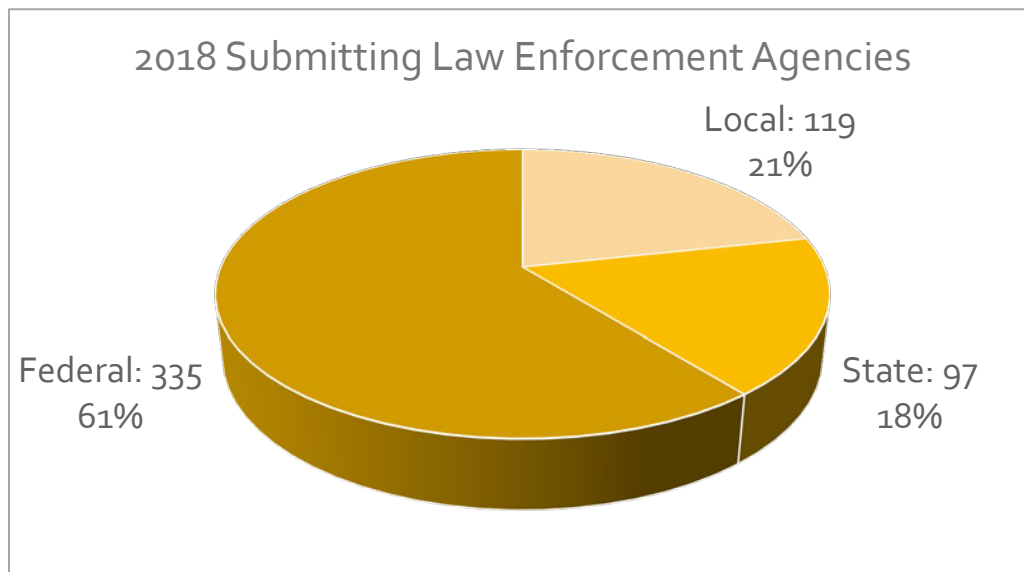
521 offenders possessing files from this series in cases submitted to NCMEC



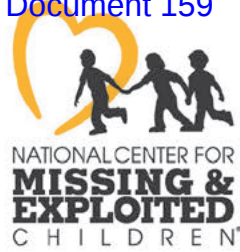
281 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

Series: Marineland1

CHILD INFORMATION

Child's date of birth: [REDACTED]

Child's gender: Female

Child's age at time of production of images: 9-11

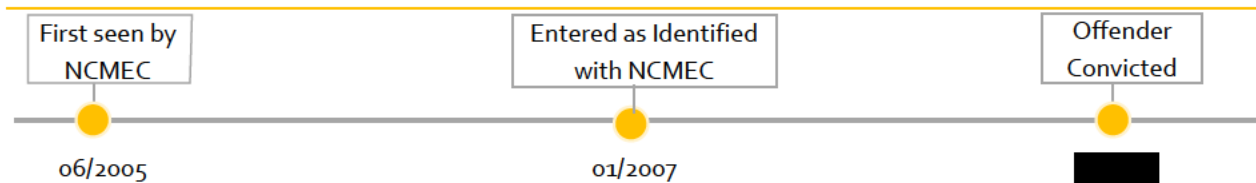
Producing offender's relationship to child: [REDACTED]

Victim Impact Statement on file: Yes, all jurisdictions

File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

CASE SUMMARY

On April 24, 2006, the U.S. Department of Homeland Security, Immigration and Customs Enforcement was contacted by the [REDACTED] County Sheriff's Office requesting forensic assistance with an on-going child abuse investigation regarding [REDACTED]. Investigators found 2 video clips and between 300 to 400 child pornography

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

images. Investigators sent copies of the images of the first victim to NCMEC's Child Victim Identification Program. A review of the image files revealed that [REDACTED] had videotaped himself sexually abusing or raping three other young female child victims, one who was 3 years old. [REDACTED] admitted to producing child pornography and circulating the images on the Internet. On June 7, 2007, [REDACTED] pled guilty to 1 count of transportation of child pornography. On October 22, 2007, [REDACTED] was sentenced to 20 years in prison.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series name: Marineland2, Marineland3, Marineland4

Relationship of Associated Victims to Offender: Marineland2: Guardian's partner, Marineland3 & Marineland4: Neighbor

Distribution of Associated Series Files: All distributed

Legal Counsel Retained by Associated Victims: None

POINT OF CONTACT

Name: Detective Deborah Behymer

Agency: Okanogan County Sheriff's Office

Email: dbehym@co.okanogan.wa.us

Phone Number: 509-422-7200, x 7731

Case Number: OW07QR06OW0005

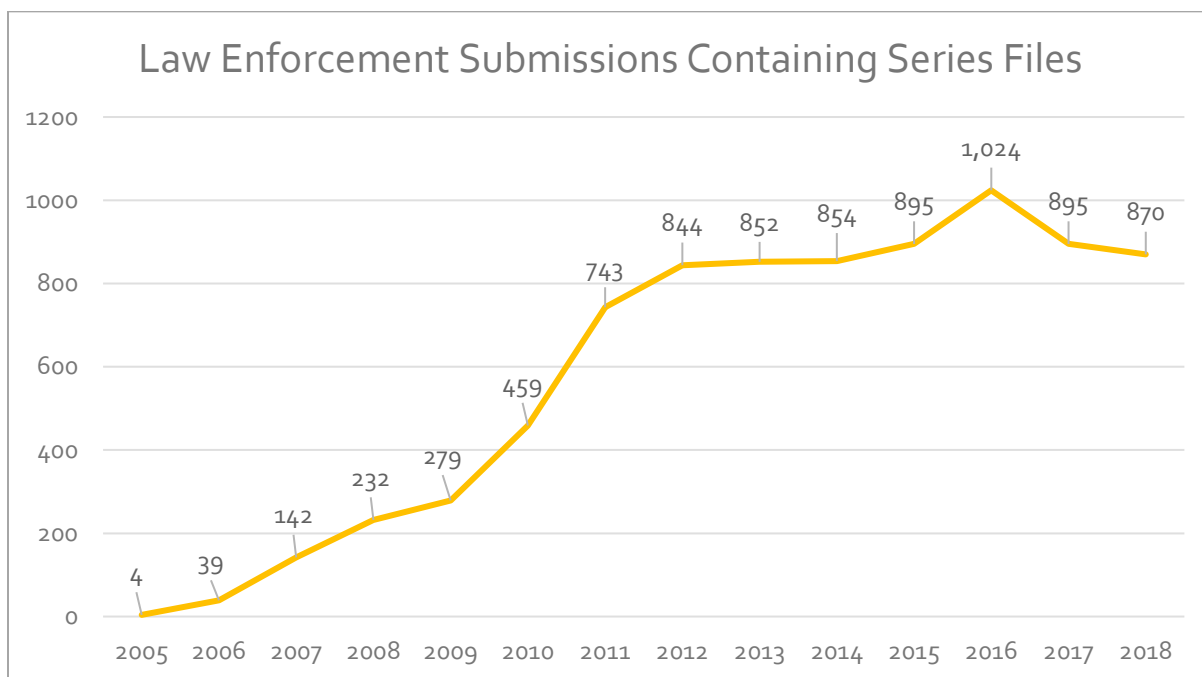
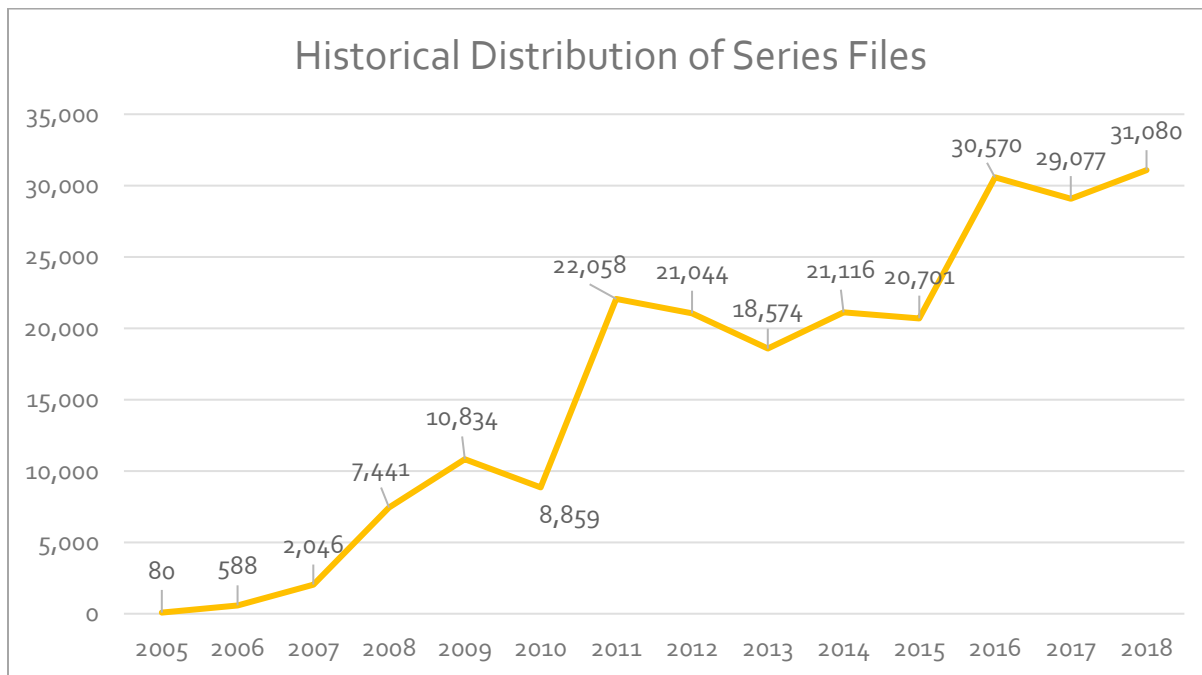
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 270 (268 images and 2 videos)

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From June 3, 2005 through December 31, 2018, files from the "Marineland1" series have been included in 8,563 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 242,720 files from the "Marineland1" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



31,080 series files submitted to NCMEC



870 law enforcement cases submitted to NCMEC containing series files



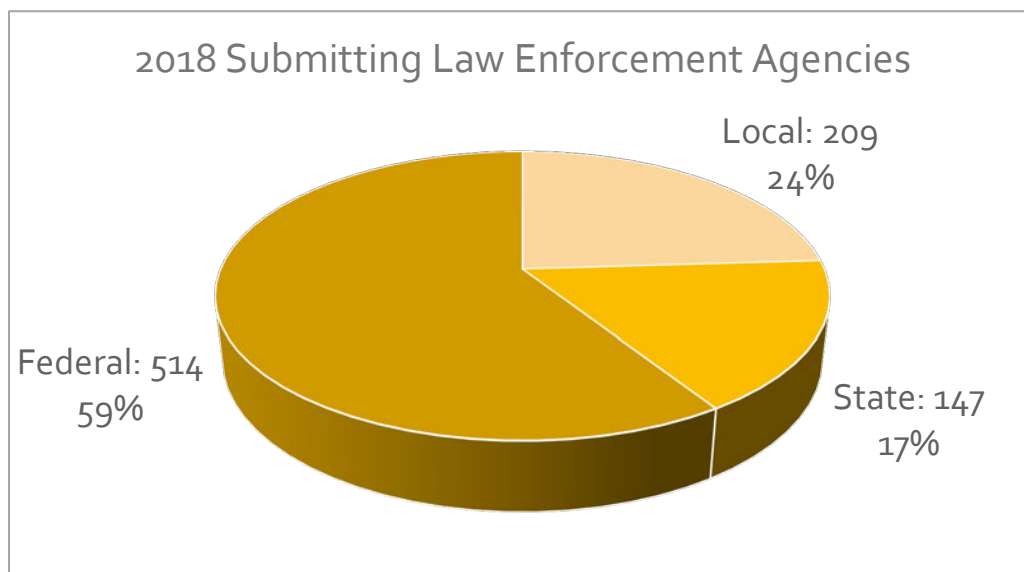
827 offenders possessing files from this series in cases submitted to NCMEC



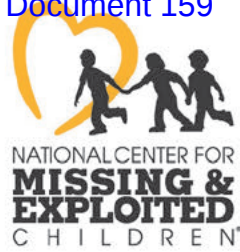
441 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

Series: Misty

CHILD INFORMATION

Child's gender: Female

Child's age at time of production of images: 9

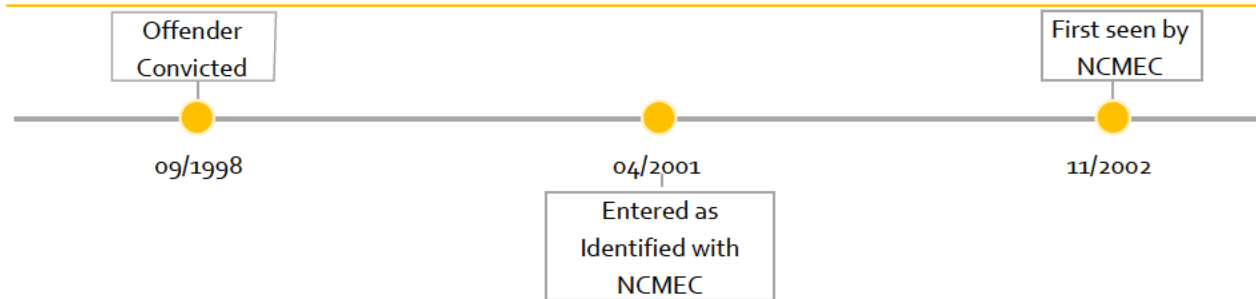
Producing offender's relationship to child: Uncle

Victim Impact Statement on file: Yes, all jurisdictions

File Type: Images

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

When she was eight and nine years old, "Amy" was repeatedly raped by [REDACTED] and sexually abused to create specific child sex abuse images requested by third parties who wanted her images for their own sexual gratification. [REDACTED] pleaded guilty and on September 24, 1999, he was sentenced to serve 10 years in prison

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

and to pay mandatory restitution in the amount of [REDACTED] to the victim. Following his imprisonment, his supervised release was revoked and he was again released from prison on March 10, 2017. His current sex offender registration lists a home address in [REDACTED]

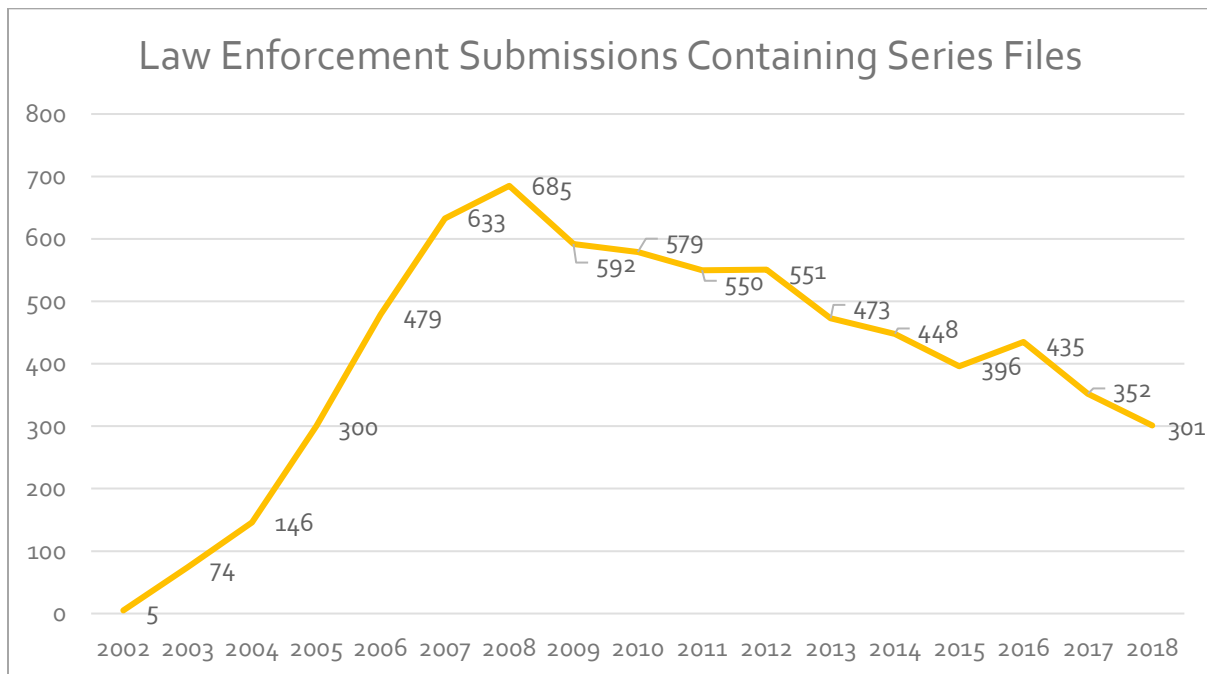
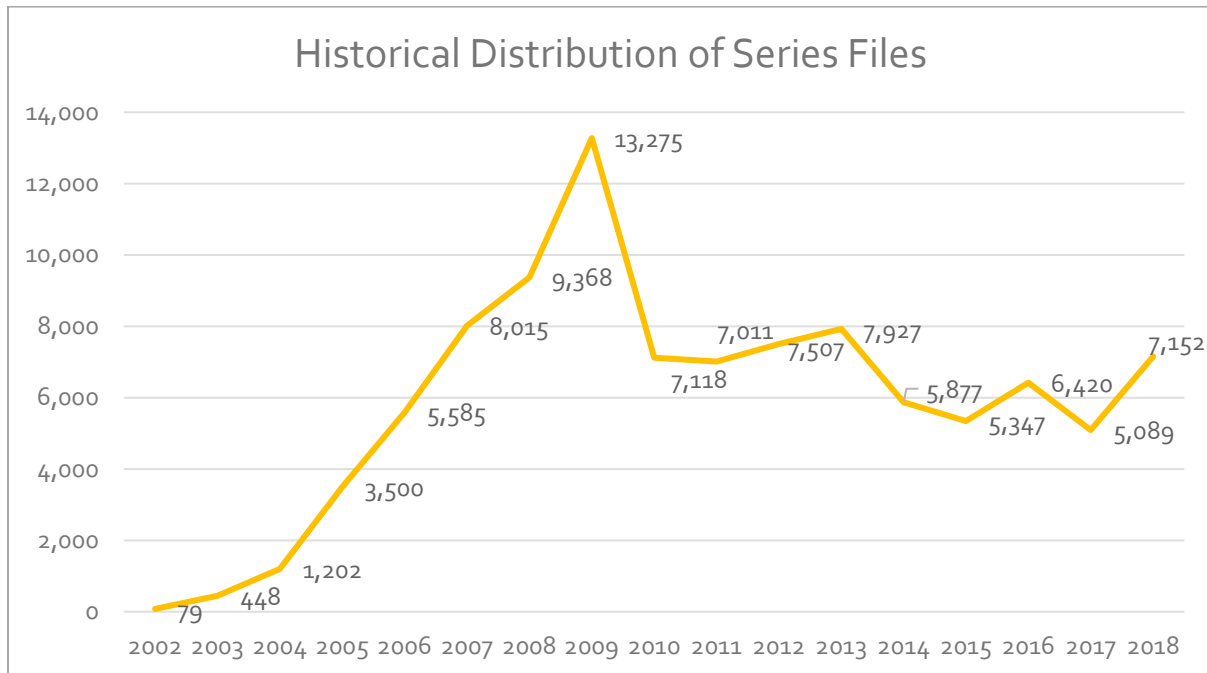
ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

None.

DISTRIBUTION INFORMATION

From November 26, 2002 through December 31, 2018, files from the "Misty" series have been included in 7,015 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 103,619 files from the "Misty" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



7,152 series files submitted to NCMEC



301 law enforcement cases submitted to NCMEC containing series files



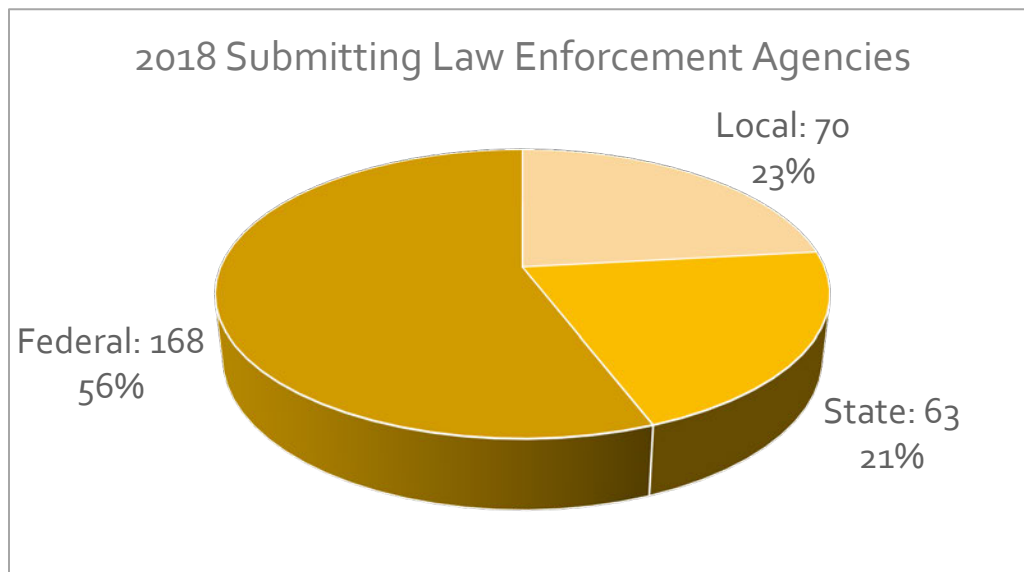
292 offenders possessing files from this series in cases submitted to NCMEC



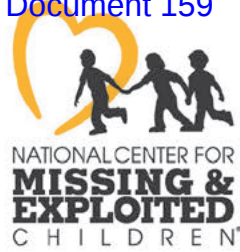
65 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

Series: PinkHeartSisters1

CHILD INFORMATION

Child's date of birth: [REDACTED]

Child's gender: Female

Child's age at time of production of images: 11

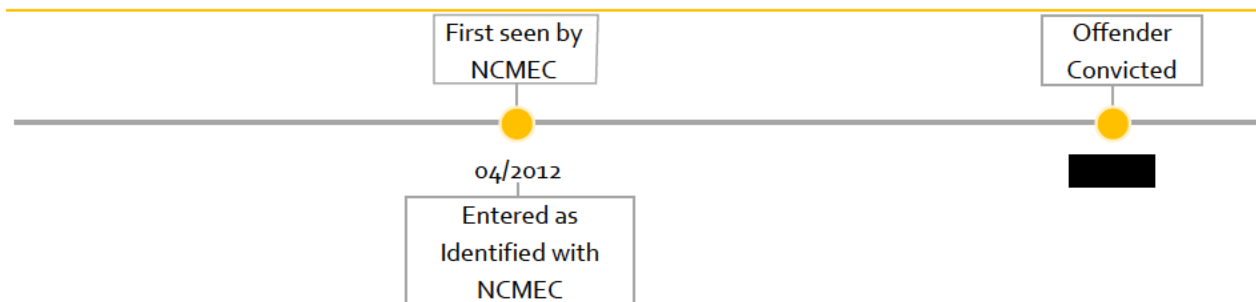
Producing offender's relationship to child: [REDACTED]

Victim Impact Statement on file: No

File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

CASE SUMMARY

On January 6, 2012, the ██████ State Police received a report of the possible possession of child pornography from administrators at the ██████ Academy, a private co-ed college preparatory boarding and day high school. ██████ was a teacher at the Academy.

██████ was interviewed by law enforcement and admitted to having child pornography on his computer, engaging in sexual contact with a young girl, taking pornographic pictures of his child victims and posting them to the Internet and sharing with other offenders the images of child pornography that he had produced.

██████'s admissions were confirmed by the forensic exam of his computer, where images of child pornography that he produced and possessed were found.

██████ was charged with 6 counts of production of child pornography, 1 count of the possession of child pornography, and 1 count of interstate travel to engage in sexual acts with a minor. On March 24, 2014, ██████ pled guilty to all charges and on September 15, 2014, he was sentenced to 30 years in prison. At sentencing, the judge stated that ██████'s criminal conduct was the worst she had ever seen in her years as a state and federal judge.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series Name: PinkHeartSisters2

Relationship of Associated Victim to Offender: Victim was daughter of PinkHeartSisters1 offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: Yes, James Marsh and Carol Hepburn

POINT OF CONTACT

Name: SA Jamie West

Agency: DHS Immigration & Customs Enforcement

Email: jamie.west@dhs.gov

Phone Number: 802-487-2622

Case Number: NT07QS12NT0002

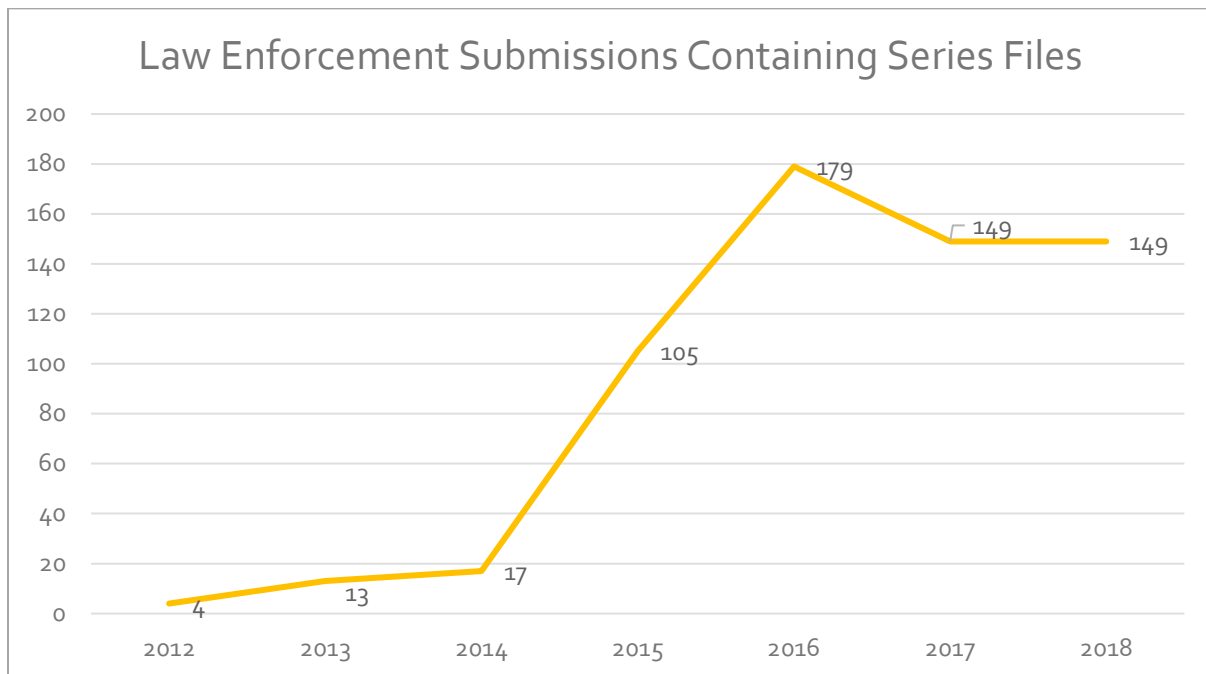
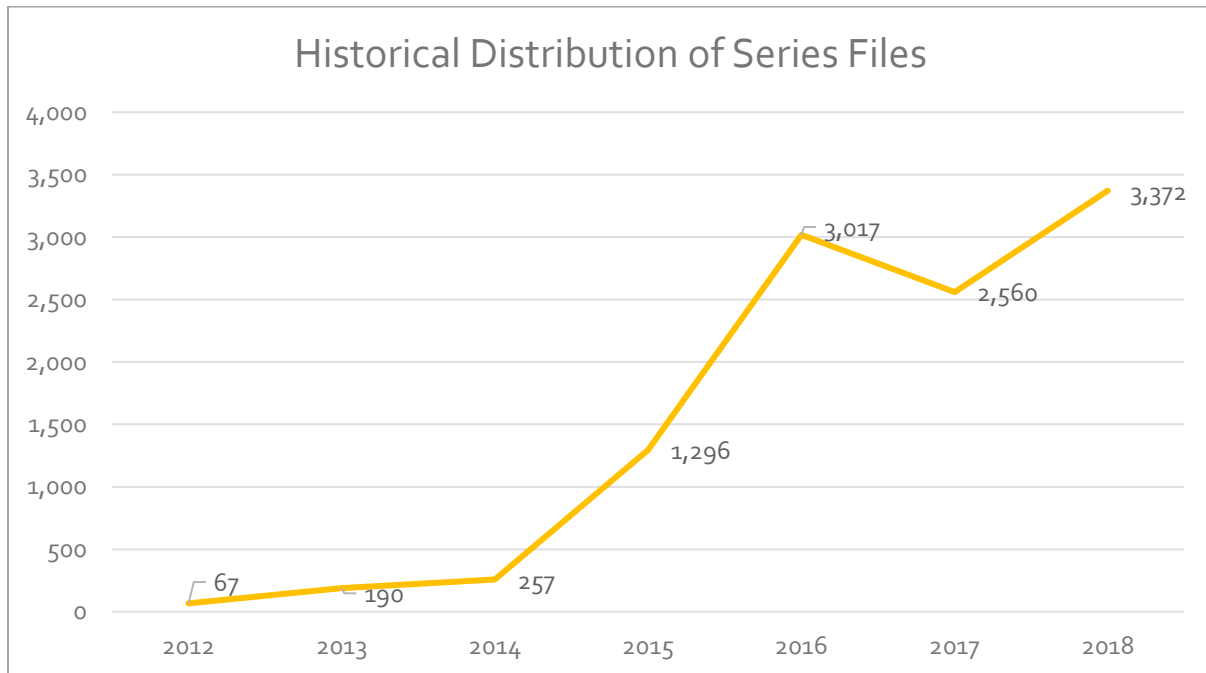
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 32 images

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From April 9, 2012 through December 31, 2018, files from the "PinkHeartSisters1" series have been included in 644 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 10,979 files from the "PinkHeartSisters1" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



3,372 series files submitted to NCMEC



149 law enforcement cases submitted to NCMEC containing series files



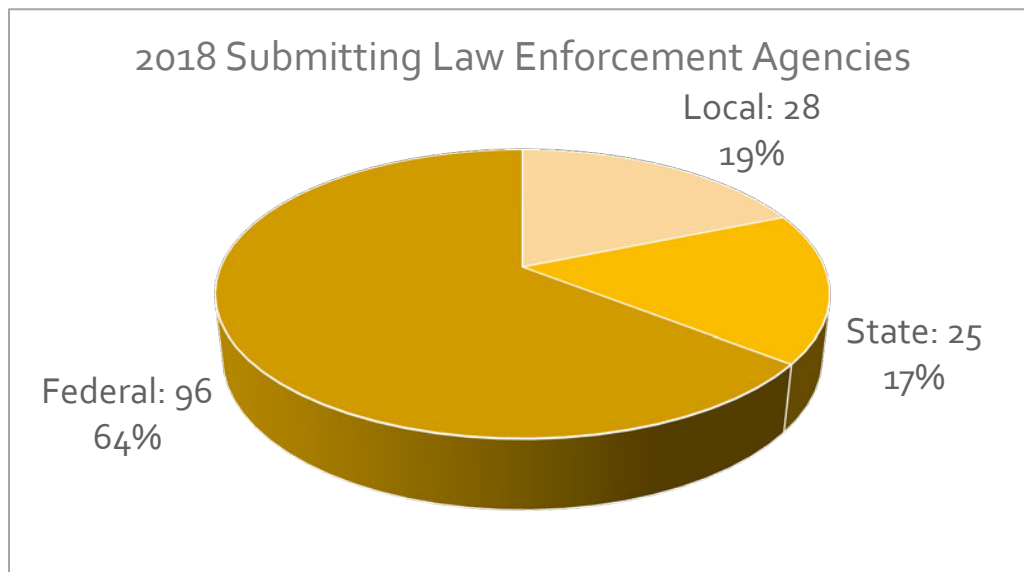
138 offenders possessing files from this series in cases submitted to NCMEC



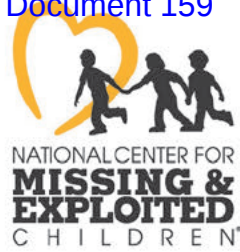
66 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



TTORNEY SERIES INFORMATION REPORT

Series: PinkHeartSisters2

CHILD INFORMATION

Child's date of birth: [REDACTED]

Child's gender: Female

Child's age at time of production of images: 9

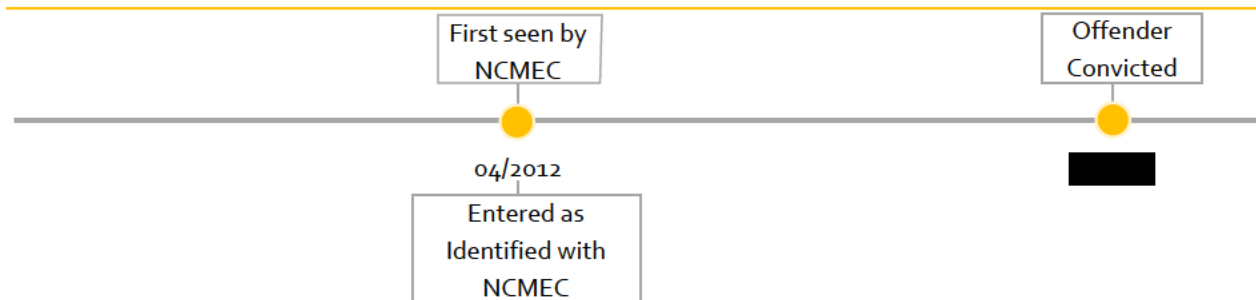
Producing offender's relationship to child: [REDACTED]

Victim Impact Statement on file: No

File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

CASE SUMMARY

On January 6, 2012, the ██████ State Police received a report of the possible possession of child pornography from administrators at the ██████ Academy, a private co-ed college preparatory boarding and day high school. ██████ was a teacher at the Academy.

██████ was interviewed by law enforcement and admitted to having child pornography on his computer, engaging in sexual contact with a young girl, taking pornographic pictures of his child victims and posting them to the Internet and sharing with other offenders the images of child pornography that he had produced.

██████'s admissions were confirmed by the forensic exam of his computer, where images of child pornography that he produced and possessed were found.

██████ was charged with 6 counts of production of child pornography, 1 count of the possession of child pornography, and 1 count of interstate travel to engage in sexual acts with a minor. On March 24, 2014, ██████ pled guilty to all charges and on September 15, 2014, he was sentenced to 30 years in prison. At sentencing, the judge stated that ██████'s criminal conduct was the worst she had ever seen in her years as a state and federal judge.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series Name: PinkHeartSisters1

Relationship of Associated Victim to Offender: Victim was daughter of PinkHeartSisters2 offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: Yes, James Marsh and Carol Hepburn

POINT OF CONTACT

Name: SA Jamie West

Agency: DHS Immigration & Customs Enforcement

Email: jamie.west@dhs.gov

Phone Number: 802-487-2622

Case Number: NT07QS12NT0002

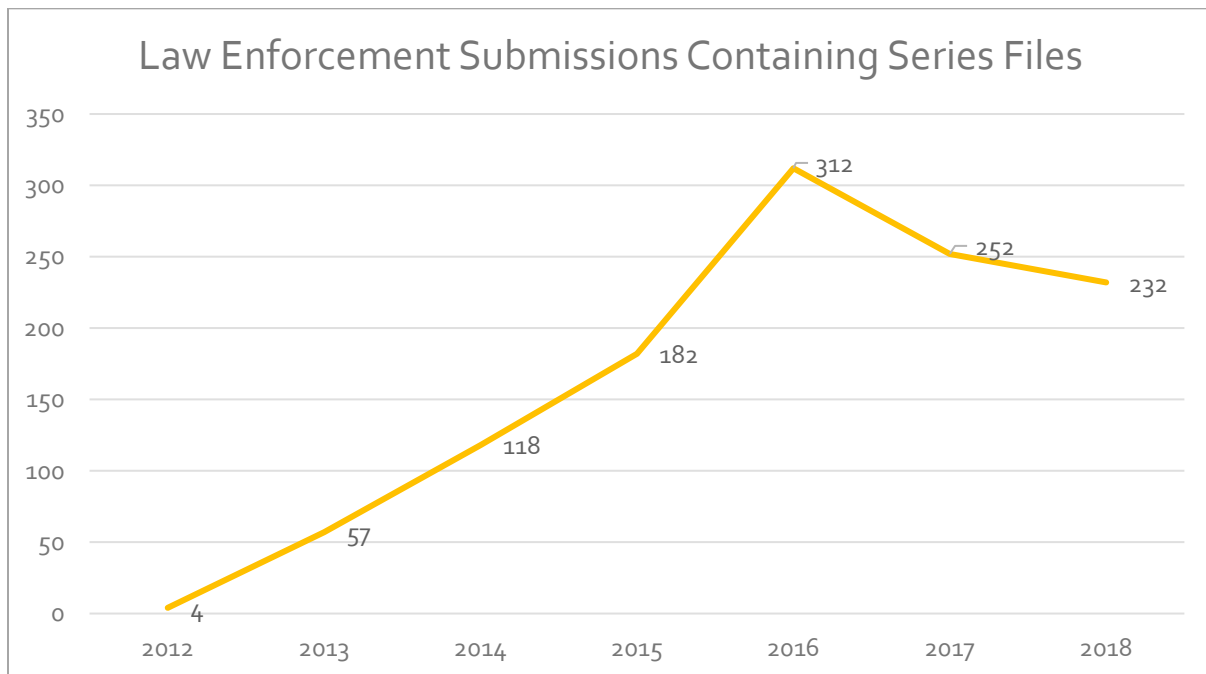
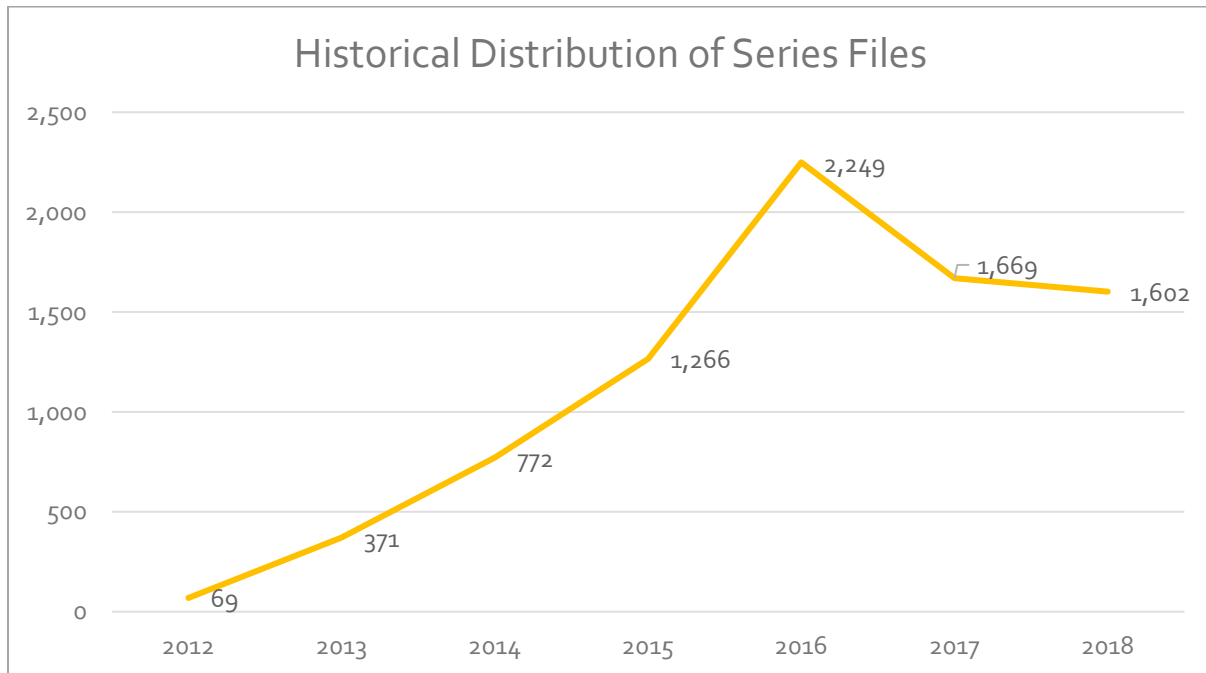
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 33 (31 images and 2 videos)

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From April 9, 2012 through December 31, 2018, files from the "PinkHeartSisters2" series have been included in 1,145 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 7,919 files from the "PinkHeartSisters2" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



1,602 series files submitted to NCMEC



232 law enforcement cases submitted to NCMEC containing series files



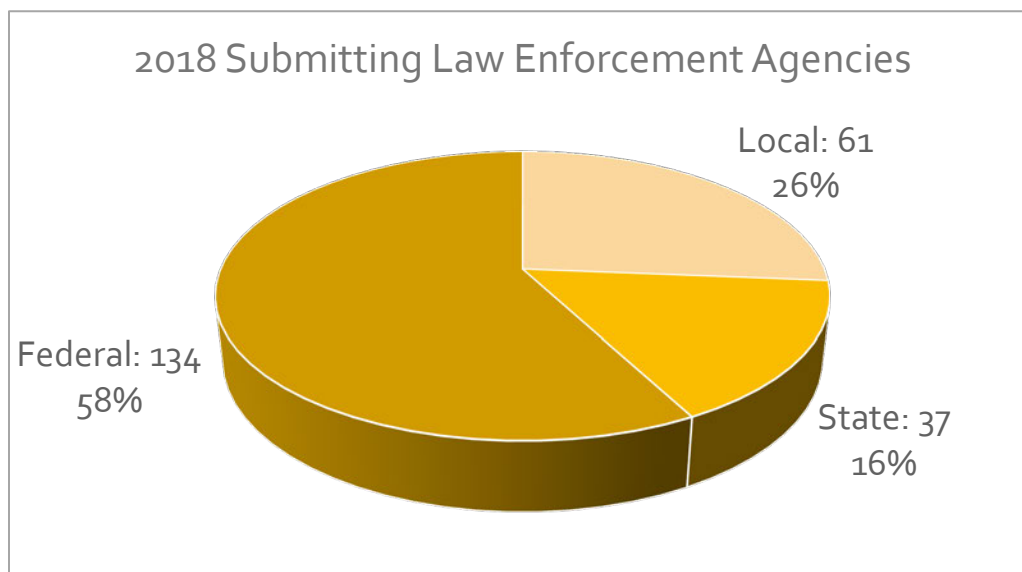
221 offenders possessing files from this series in cases submitted to NCMEC



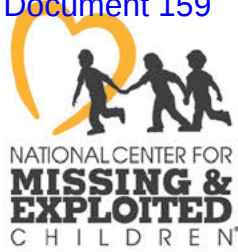
79 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

Series: Sweet Pink Sugar

CHILD INFORMATION

Child's date of birth: [REDACTED]

Child's gender: Female

Child's age at time of production of images: 6-9

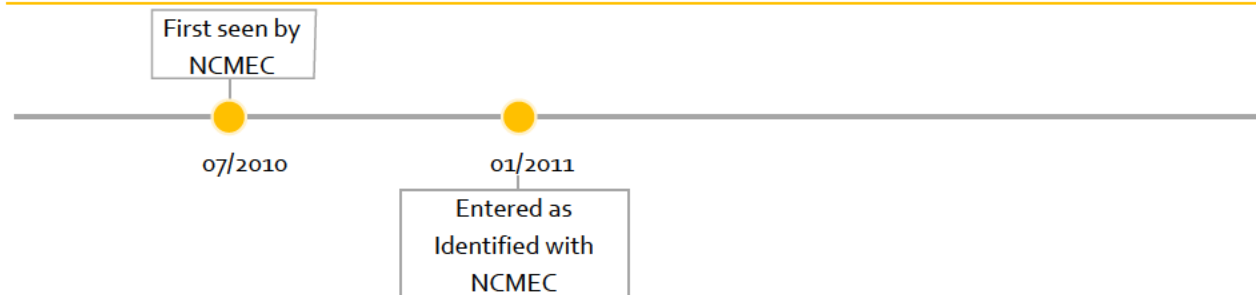
Producing offender's relationship to child: [REDACTED]

Victim Impact Statement on file: Yes, all jurisdictions

File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series Name: Sweet White Sugar

Relationship of Associated Victim to Offender: Sweet White Sugar is [REDACTED] of Sweet Pink Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: Yes, Carol Hepburn and Debbie Bianco

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

Associated Series Name: Sweet Purple Sugar

Relationship of Associated Victim to Offender: Sweet Purple Sugar is [REDACTED] of Sweet Pink Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: Yes, Carol Hepburn and Debbie Bianco

Associated Series Name: Sweet Brown Sugar

Relationship of Associated Victim to Offender: Sweet Brown Sugar is neighbor/babysat by Sweet Pink Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: No

Associated Series Name: Sweet Burgundy Sugar

Relationship of Associated Victim to Offender: Sweet Burgundy Sugar is neighbor/babysat by Sweet Pink Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: No

Associated Series Name: Sweet Blue Sugar

Relationship of Associated Victim to Offender: Sweet Blue Sugar is neighbor/babysat by Sweet Pink Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: No

POINT OF CONTACT

Name: Victim Identification Unit

Agency: BC Integrated Child Exploitation

Email: ICE_BC_VI@rcmp-grc.gc.ca

Phone Number: 778-290-3930

Case Number: 2010-690

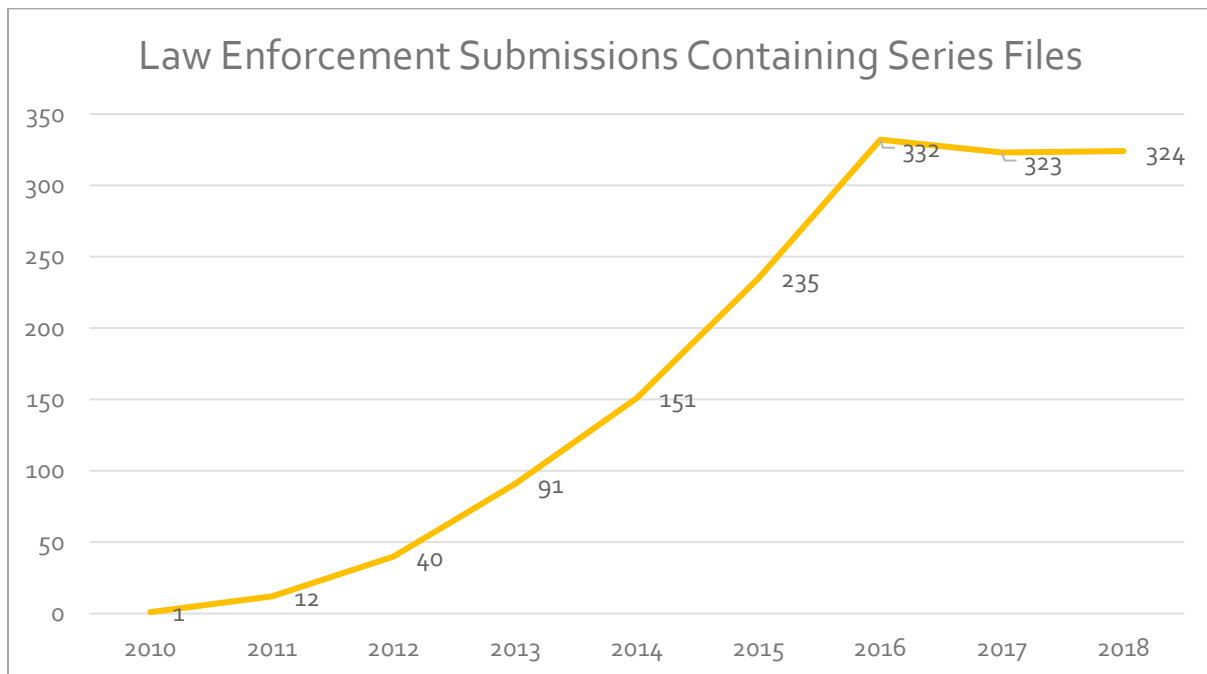
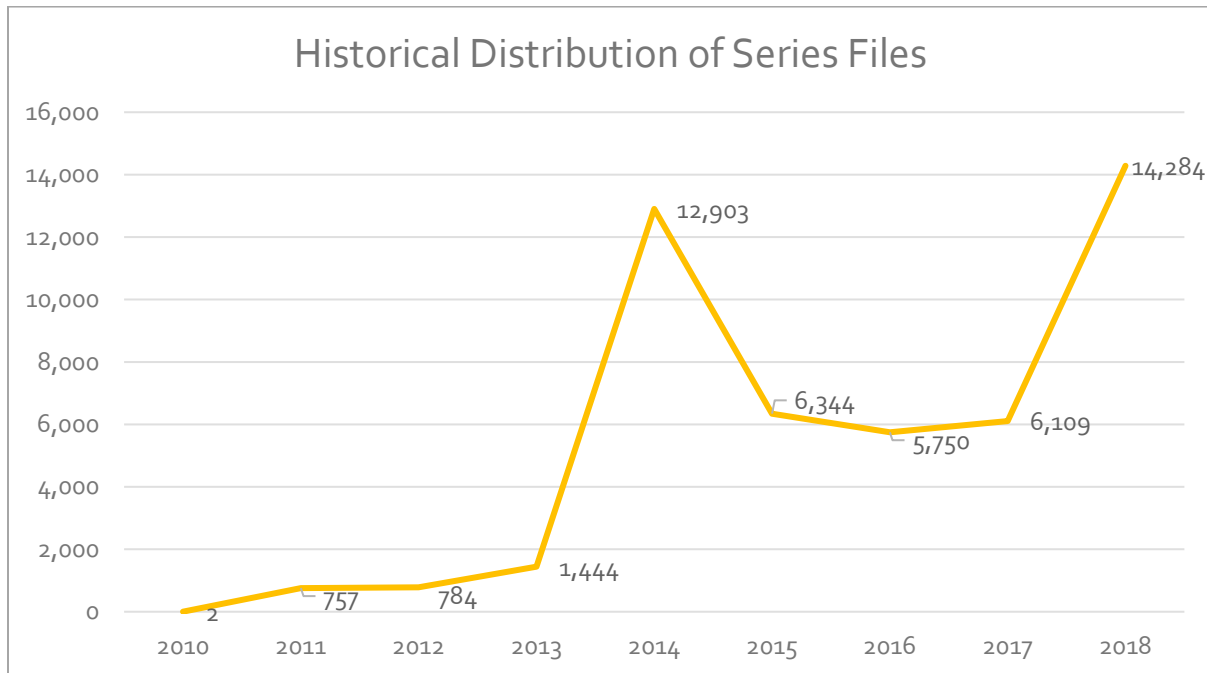
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 566 images

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From July 15, 2010 through December 31, 2018, files from the "Sweet Pink Sugar" series have been included in 1,506 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 48,363 files from the "Sweet Pink Sugar" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



14,284 series files submitted to NCMEC



324 law enforcement cases submitted to NCMEC containing series files



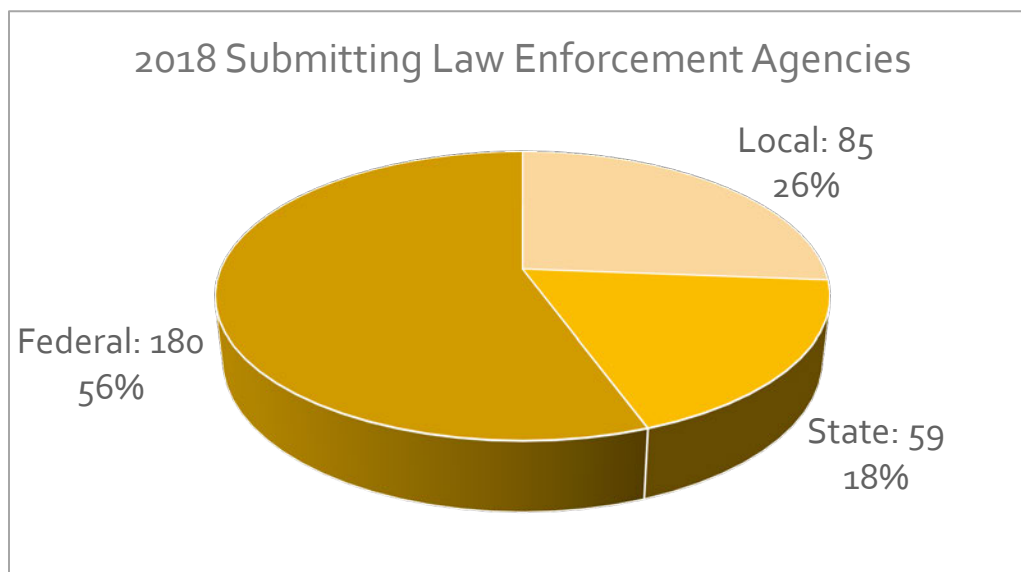
307 offenders possessing files from this series in cases submitted to NCMEC



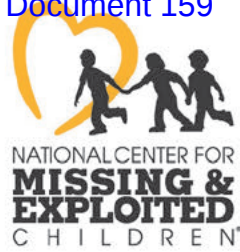
462 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

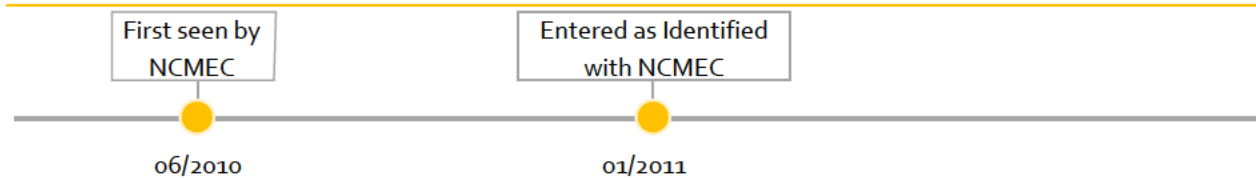
Series: Sweet White Sugar

CHILD INFORMATION

Child's date of birth: [REDACTED]
 Child's gender: Female
 Child's age at time of production of images: 3-6
 Producing offender's relationship to child: [REDACTED]
 Victim Impact Statement on file: Yes, all jurisdictions
 File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

Associated Series Name: Sweet Purple Sugar
 Relationship of Associated Victim to Offender: Sweet Purple Sugar is [REDACTED] of Sweet White Sugar offender
 Distribution of Associated Series Files: Yes
 Legal Counsel Retained by Associated Victim: Yes, Carol Hepburn and Debbie Bianco

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

Associated Series Name: Sweet Pink Sugar

Relationship of Associated Victim to Offender: Sweet Pink Sugar is [REDACTED] of Sweet White Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: Yes, Carol Hepburn and Debbie Bianco

Associated Series Name: Sweet Brown Sugar

Relationship of Associated Victim to Offender: Sweet Brown Sugar is neighbor/babysat by Sweet White Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: No

Associated Series Name: Sweet Burgundy Sugar

Relationship of Associated Victim to Offender: Sweet Burgundy Sugar is neighbor/babysat by Sweet White Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: No

Associated Series Name: Sweet Blue Sugar

Relationship of Associated Victim to Offender: Sweet Blue Sugar is neighbor/babysat by Sweet White Sugar offender

Distribution of Associated Series Files: Yes

Legal Counsel Retained by Associated Victim: No

POINT OF CONTACT

Name: Victim Identification Unit

Agency: BC Integrated Child Exploitation

Email: ICE_BC_VI@rcmp-grc.gc.ca

Phone Number: 778-290-3930

Case Number: 2010-690

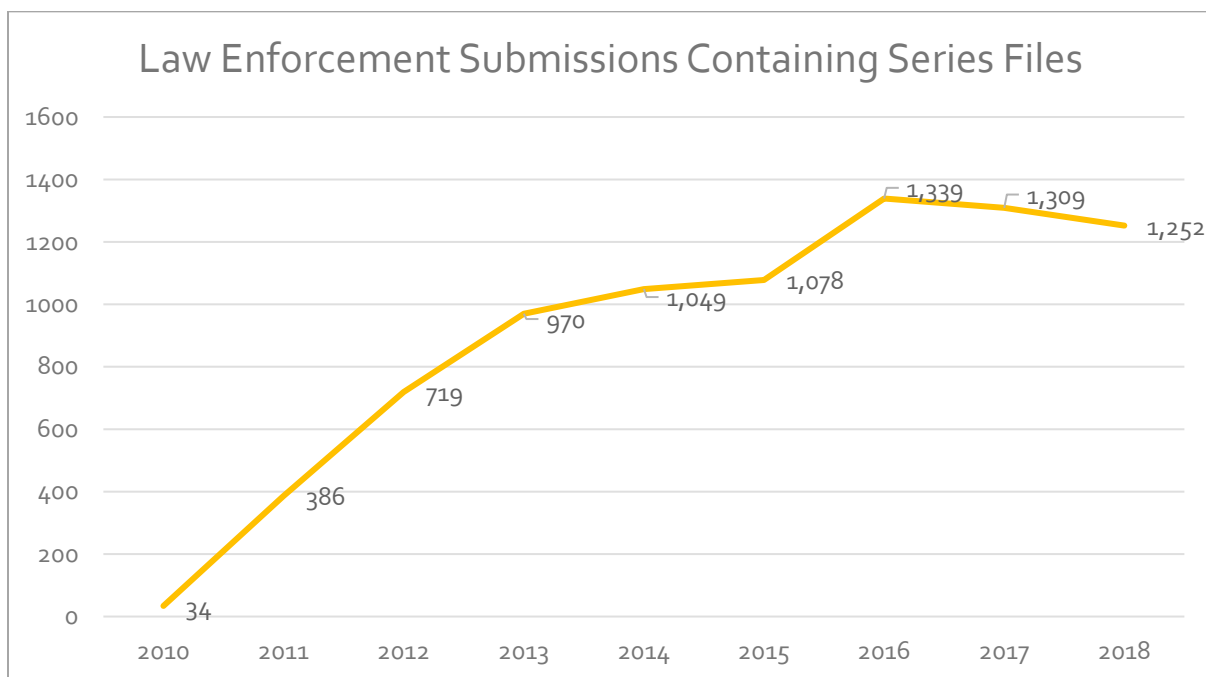
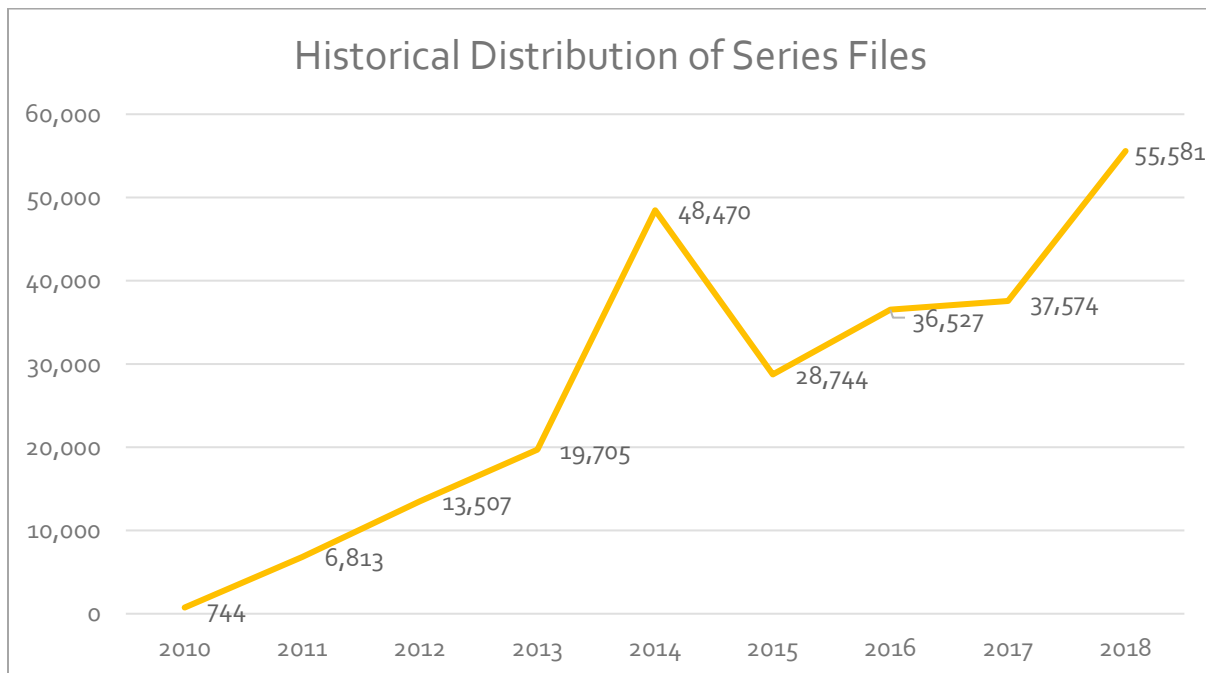
DISTRIBUTION INFORMATION

Number of identified files submitted by law enforcement: 733 images

(This represents only files that law enforcement seized from the producer of the series and submitted to NCMEC. Additional files that may exist, but were not in the producer's possession, are not included. The number of files shown above includes visually unique files as well as files that are visually similar, e.g., cropped, rotated, edited.)

From June 4, 2010 through December 31, 2018, files from the "Sweet White Sugar" series have been included in 8,117 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 246,711 files from the "Sweet White Sugar" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



55,581 series files submitted to NCMEC



1,252 law enforcement cases submitted to NCMEC containing series files



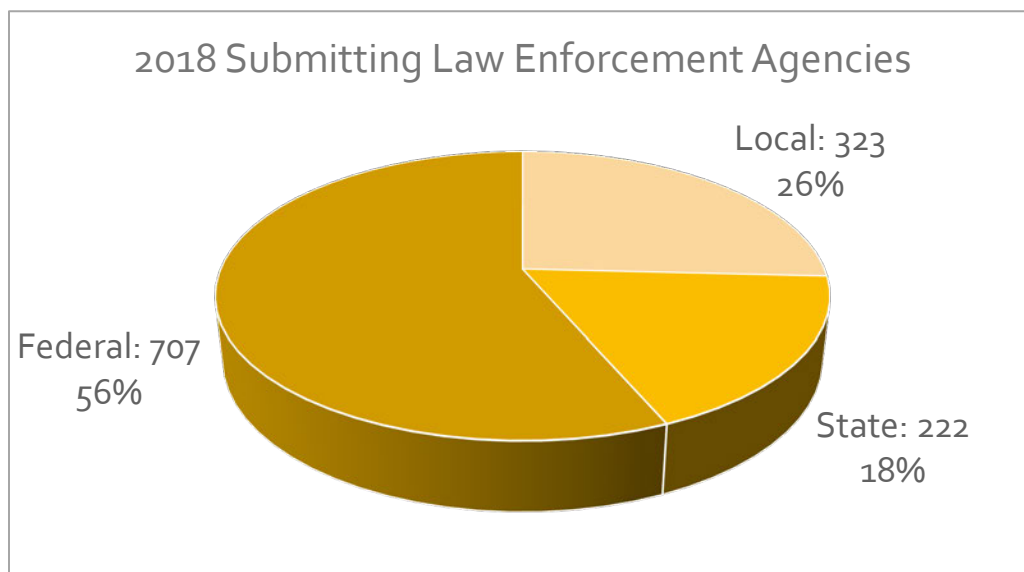
1,170 offenders possessing files from this series in cases submitted to NCMEC



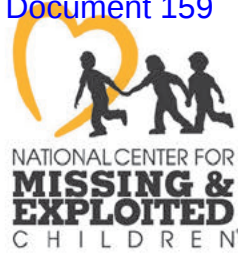
1,020 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)



ATTORNEY SERIES INFORMATION REPORT

Series: Vicky

CHILD INFORMATION

Child's date of birth: [REDACTED]

Child's gender: Female

Child's age at time of production of images: 10-11

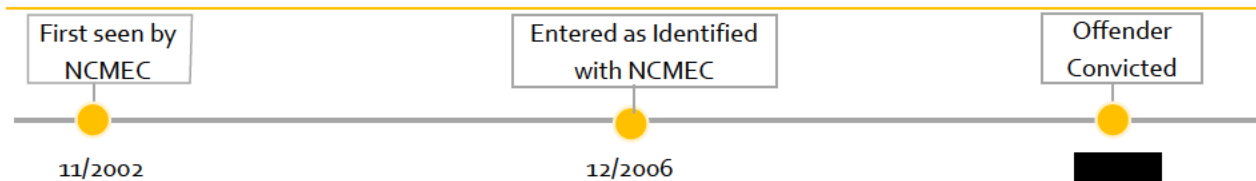
Producing offender's relationship to child: [REDACTED]

Victim Impact Statement on file: Yes, all jurisdictions

File Type: Images and Videos

CASE INFORMATION

CASE TIMELINE



(Given multiple information sources some discrepancies may occur in dates shown above.)

CASE SUMMARY

[REDACTED] was a former sheriff's reserve deputy in [REDACTED] who sexually abused his [REDACTED] over a two-year period, starting when she was 10 years old. When the child was [REDACTED] years old, she disclosed the abuse to her mother. The photos of her sexual abuse were posted by her father to the Internet. After being arrested, [REDACTED] fled [REDACTED], first crossing the border into [REDACTED] and then flying to [REDACTED]. For the next year

The National Center for Missing & Exploited Children (NCMEC) is a private, non-profit 501(c)(3) organization that serves as a national clearinghouse and resource center for families, victims, private organizations, attorneys, law enforcement, and the public on missing and sexually exploited child issues. To further its private, nonprofit mission to reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Program. NCMEC does not act in the capacity of or under the direction or control of the government or any law enforcement agency.

he was on the most wanted fugitive lists for the U.S. Marshals and ICE and was featured on an episode of America's Most Wanted. After a year in [REDACTED], he was arrested while on a trip to [REDACTED] and returned to the [REDACTED]. He pled guilty on December 17, 2008 and was sentenced to serve 50 years in prison and ordered to pay [REDACTED] in restitution.

ASSOCIATED SERIES (ADDITIONAL VICTIM SERIES CREATED BY SAME OFFENDER)

None

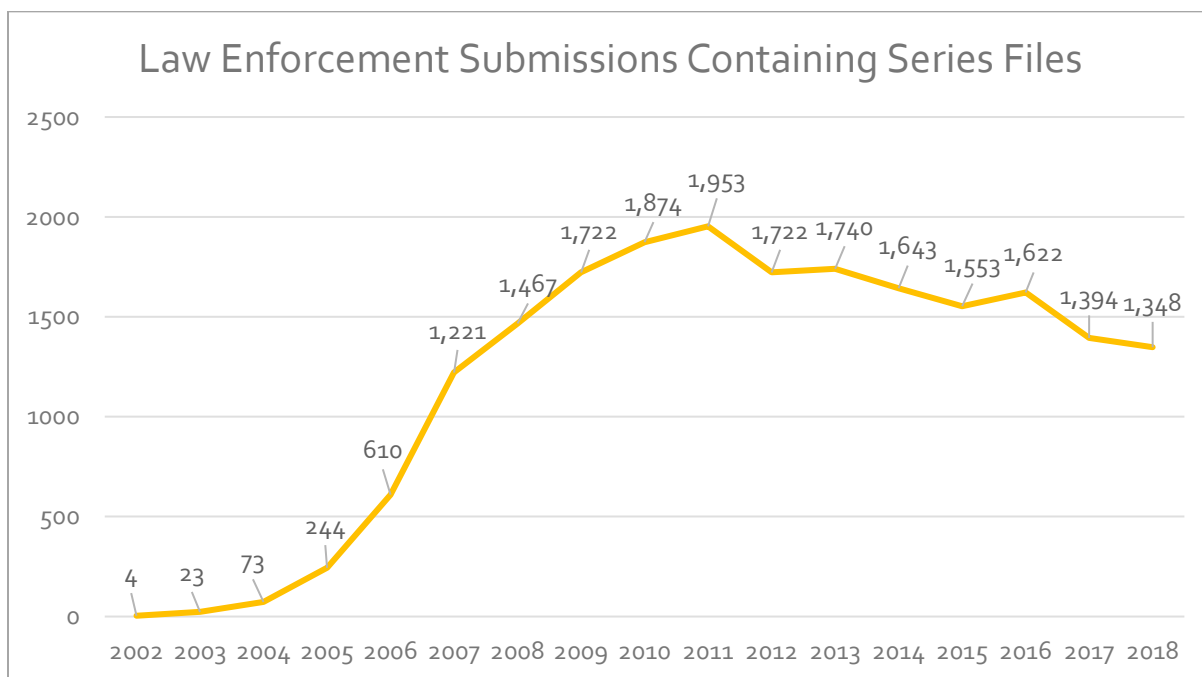
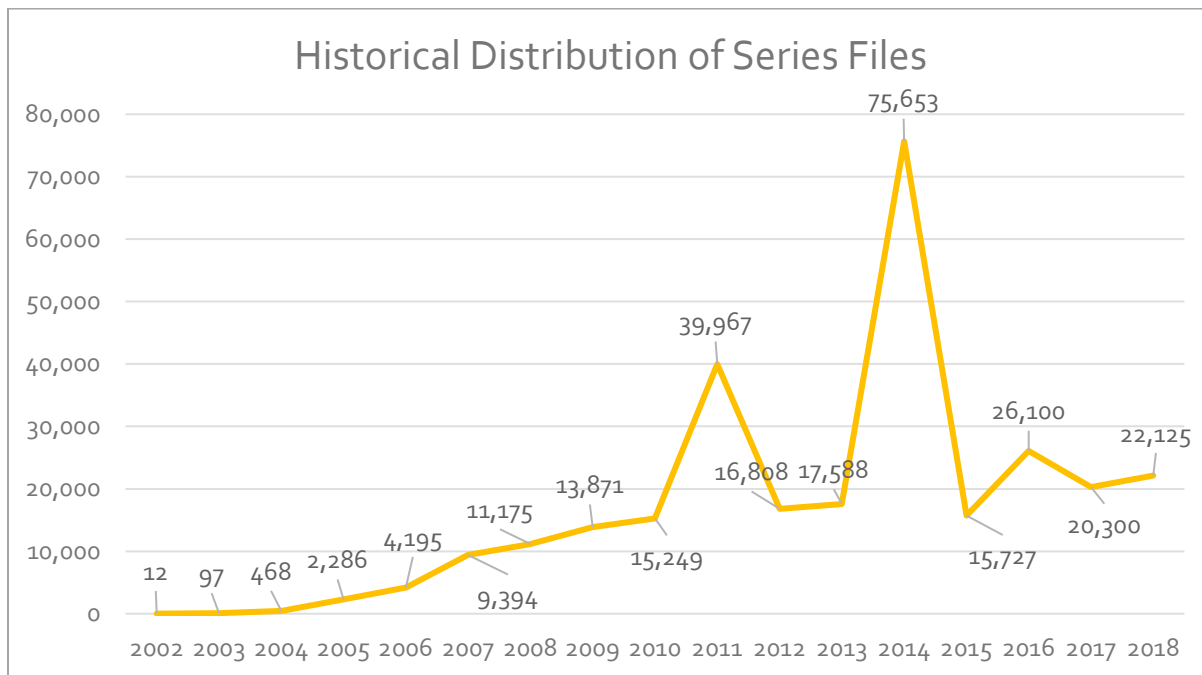
POINT OF CONTACT

Name: SSA Joshua Findley
Agency: DHS Immigration & Customs Enforcement
Email: josh.s.findley@ice.dhs.gov
Phone Number: 503-326-7491

DISTRIBUTION INFORMATION

From November 15, 2002 through December 31, 2018, files from the "Vicky" series have been included in 20,218 law enforcement submissions of content to NCMEC that were seized from offenders. NCMEC's review of these submissions indicated that they included a total of 291,073 files from the "Vicky" series.

HISTORICAL DISTRIBUTION



This Report is provided to the attorney of record for the Child Sexual Abuse Imagery (CSAI) victim whose series the Report describes, after verification of current legal representation. The information contained in this Report is derived exclusively from NCMEC's records and is current only as of the creation date indicated above. The information contained in the Report may not be comprehensive. This Report is intended solely for informational purposes in furtherance of NCMEC's nonprofit mission to provide assistance to CSAI victims. Please treat the information in this Report as sensitive and confidential and do not reproduce or further distribute this Report.

2018 SERIES DISTRIBUTION BREAKDOWN



22,125 series files submitted to NCMEC



1,348 law enforcement cases submitted to NCMEC containing series files



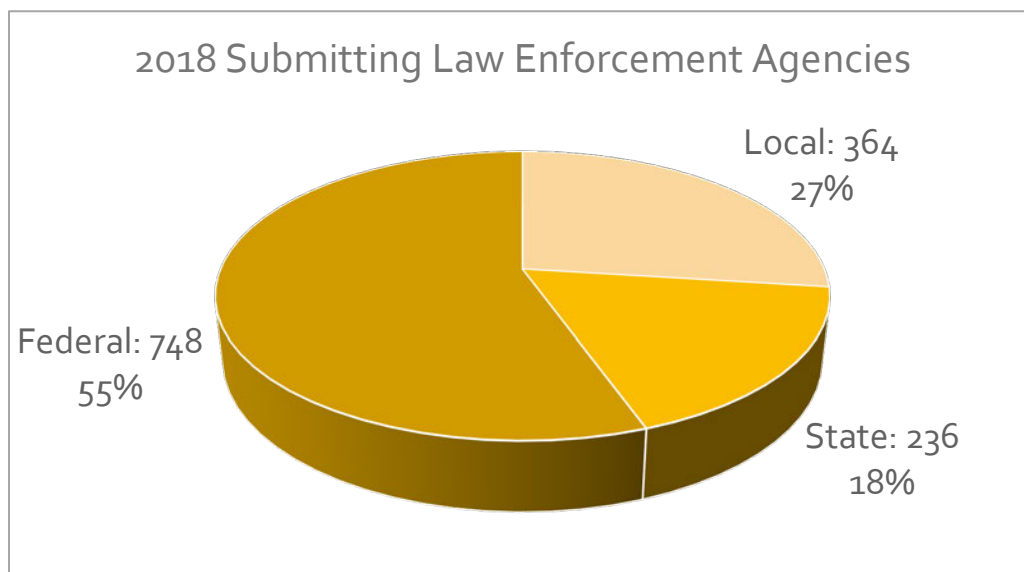
1,274 offenders possessing files from this series in cases submitted to NCMEC



1,009 CyberTipline reports submitted by Electronic Service Providers containing series files



Known international distribution of series files



(There are no statutory requirements for law enforcement to submit child sexual exploitation content seized from offenders to NCMEC. Most states do not notify children when their sexual abuse images are circulated in state or local prosecutions.)

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Amy	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES with no attachments</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrator re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st</p>	<p>02/07/20 - RESPONSES SENT</p> <p>03/20/20 – ATTACHMENTS SENT</p> <p>No. 1 – letter dated 12/9/19 – Real name, DOB and Original perpetrator</p> <p>No. 3 – letter dated 3/18/20 – original perpetrator's prosecution</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	<p>04/20/20 – corrected responses nos. 37-43, 46 and supplemental response to no. 47 with attachments mailed on CD</p> <p>No. 37A– Silberg file - redacted</p> <p>No. 37B – Silberg Forensic Eval – redacted.</p>	<p>05/15/20 Responses and updated unredacted forensic reports and all produced documents bates stamped and sent via dropbox</p> <p>Bates: 000001-000279</p>	-0-	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	<p>11/30/20</p> <p>Plaintiff's Expert Witness Disclosure</p>

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	<p>redacted (black) VNS re Def RFP No. 34</p> <p>11/08/19 – CLH email to Opposing re Kennedy case was a “distribution” case in response to RFP No. 26</p>	<p>RFPs with attachments</p> <p>No. 34 – redacted and unredacted VNS notifications for plaintiffs re defendant Curtis</p>	<p>No. 33A – orig restitution request with VIS, Redacted Psych Evals by Dr. Silberg dated 11/21/08, 10/21/10; 1/23/11; 10/23/12; 12/8/14; CV of Dr. Silberg; Redacted Economic Eval from Dr. Smith 12/15/08 and CV; info re making restitution payments to Marsh firm</p> <p>No. 33B – all communicatio</p>						

EX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

			ns between plaintiff attorneys and third parties referencing litigation.						
--	--	--	--	--	--	--	--	--	--

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Erika	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>121919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>02/07/20 - RESPONSES SENT</p> <p>03/20/20 – ATTACHMENTS SENT</p> <p>No. 1 – letter dated 12/19/19 – Real name, DOB and Original perpetrator</p> <p>No. 3 – letter dated 3/18/20 – original perpetrator's prosecution</p> <p>No. 4 – Attorney Series Info</p>	<p>04/23/20 responses emailed by Carol and Ethan accepted as official service</p> <p>Corrected supplemental responses nos. 37-42</p>	<p>05/08/20 Responses and updated unredacted forensic reports and all produced documents bates stamped and sent via dropbox</p> <p>Bates: 000001-000151</p>	-0-	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	<p>11/30/20</p> <p>Pltfs' Disclosure of experts</p>

EX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

	redacted (black) VNS re Def RFP No. 34	attachmen ts No. 34 – redacted and unredacted VNS notifications for plaintiffs re defendant Curtis	Report from NCMEC No. 33A – Curtis restitution request No. 33B – all communications between plaintiffs' attorneys and third parties referencing litigation.						
--	--	--	---	--	--	--	--	--	--

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Jenny	11/4/19 RESPONSE with no attachments 110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34 110719 – email with attachments - production of all Pltfs re	12/06/19 RESPONSES NO ATTACHMENTS 121919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3 12/26/19 – Pltfs' Global supp Responses to Def 1 st RFPs with	02/07/20 - RESPONSES SENT 03/20/20 – ATTACHMENTS SENT No. 1 – letter dated 12/19/19 – Real name, DOB and Original perpetrator No. 3 – letter dated 3/18/20 – original perpetrator's prosecution No. 4 – Attorney Series Info	04/20/20 RESPONSES with no attachments corrected response nos. 38-42	5/12/20 Responses and updated unredacted forensic reports and all produced documents bates stamped and sent via dropbox Bates: 000001-000367 081320 – further responses re Jenny via email to Ethan and Nara	-0-	8/17/19 Initial Disclosures 10/28/20 Supplemental Disclosures	1/22/21 Pltfs' Global Answer to Def's 1 st set of Special Interrogatories And Pltfs' Global Responses to Def's 2 nd Rfps with no attachments	11/30/20 Pltfs' Disclosure of experts

BX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	redacted (black) VNS re Def RFP No. 34	attachmen ts No. 34 – redacted and unredacted VNS notifications for plaintiffs re defendant Curtis	Report from NCMEC No. 33A – orig restitution request with VIS and expert report from redacted report from Kathleen Coulborn of Catholic Social Services and CV; Psychological Assessment 11/18/17 by Elizabeth Toplyn, PhD; Economic Eval by Dr. Smith 12/10/18; note re making restitution payments		after meet and confer with Ethan on 8/10/20				

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

			No. 33B – all communications between plaintiffs' counsel and third parties referencing litigation.						
--	--	--	--	--	--	--	--	--	--

8X. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Jessica	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>02/07/20 - RESPONSES SENT</p> <p>03/20/20 – ATTACHMENTS SENT</p> <p>No. 1 – letter dated 12/9/19 with real name, DOB and original perpetrator</p> <p>No. 3 – letter dated 3/18/20 – original perpetrator's prosecution</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	<p>04/20/20 RESPONSES with no attachments; corrected response nos. 37-42</p>	<p>05/13/20 Responses and updated unredacted forensic reports and all produced documents bates stamped and sent via dropbox</p> <p>Bates: 000001-000242</p>	-0-	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	<p>11/30/20</p> <p>Pltfs' Disclosure of experts</p>

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	redacted (black) VNS re Def RFP No. 34	attachmen ts No. 34 – redacted and unredacted VNS notifications for plaintiffs re defendant Curtis	No. 33A – restitution request; VIS; redacted psych consult by Silberg on 8/21/16; economic report by Dr. Smith 4/16/19; note re making restitution payments No. 33B – all communications between plaintiffs' counsel and third parties referencing litigation.						

EX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Lily	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>02/07/20 – RESPONSES SENT</p> <p>02/27/20 – ATTACHMENTS SENT</p> <p>No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator and copy of Order Changing Name (Adult)</p> <p>No. 3 – letter dated 2/27/20 – original perpetrator's prosecution</p>	N/A	04/24/20	6/18/20	8/17/19	1/22/21	11/30/20
					No. 4 – Sanitized cp photos	Responses and updated unredacted forensic reports and all produced documents , Vicky Video VIS, Affidavit of Detective Roy Shepherd, Declaration of Dr. Sharon Cooper re Stivers bates stamped and sent	Initial Disclosures 10/28/20 Supplemental Disclosures	Pltfs' Global Answer to Def's 1 st set of Special Interrogatories And Pltfs' Global Responses to Def's 2 nd Rfps with no attachments	Pltfs' Disclosure of experts

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

	<p>redacted (black) VNS re Def RFP No. 34 11/08/19 – CLH email to Opposing re Kennedy case was a “distribution” case in response to RFP No. 26</p> <p>120919 letter to opposing with real names, DOBs and original perpetrators for all CLH and DAB pltfs re Def RFPs 1-3</p>	<p>attachments</p> <p>No. 34 – redacted and unredacted VNS notifications for plaintiffs re defendant Curtis</p>	<p>No. 4 – Attorney Series Info Report from NCMEC</p> <p>No. 5 – restitution request; all VIS; Browser search results; Dr. Green's psych reports dated 7/24/09; 12/02/09; 7/5/10; 1/23/12; 3/13/12; 3/26/14; 4/23/14; 12/2/15; his CV; CV of Merrill Cohen, CV of Dr. Smith; pinkish</p>			<p>via dropbox</p> <p>Bates: 000001-000690</p>			
--	---	---	--	--	--	--	--	--	--

EX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
			<p>blog; report of Sharon Cooper, MD 11/5/16; Cooper CV</p> <p>No. 7 – Cohen reports 2/10/10; 3/10/10; and 4/23/14</p> <p>No. 8 – Smith reports 11/10/10; and 5/5/14</p> <p>No. 20 – App for PHV re Albert Lee Mitchell EDCA</p> <p>No. 26 - Lily Judgment spreadsheet</p>						

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

			No. 33 - all communications between plaintiffs' counsel and third parties referencing litigation.						
--	--	--	---	--	--	--	--	--	--

EX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

Maureen	11/4/19 RESPONSE with no attachments 110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34 110719 – email with attachments - production of all Pltfs re	12/06/19 RESPONSES NO ATTACHMENTS 120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3 12/26/19 – Pltfs' Global supp Responses to Def 1 st RFPs with	2/12/20 RESPONSES SENT 03/13/20 – ATTACHMENTS SENT No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator No. 3 – letter dated 3/13/20 – original perpetrator info from ASIR No. 4 – Attorney Series Info Report from NCMEC	N/A	04/24/20 No. 4 – Sanitized Images	5/20/20 Responses and updated unredacted forensic reports, sanitized photos and all produced documents bates stamped and sent via dropbox Bates: 000001-000187 081320 – further responses	8/17/19 Initial Disclosures 10/28/20 Supplemental Disclosures	1/22/21 Pltfs' Global Answer to Def's 1 st set of Special Interrogatories And Pltfs' Global Responses to Def's 2 nd Rfps with no attachments	11/30/20 Pltfs' Disclosure of experts
---------	---	--	--	-----	--	--	--	---	--

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	<p>redacted (black) VNS re Def RFP No. 34</p> <p>120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3</p>	<p>attachmen ts</p> <p>No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis</p>	<p>No. 26 – Judgment and Order re Restitution Pymts re Gerard Jones; Judgment re Curtis; Judgment re Cragg</p> <p>No. 33 - all communicatio ns between plaintiffs' counsel and third parties referencing litigation.</p>			<p>re Maureen via email to Ethan and Nara after meet and confer with Ethan on 8/10/20</p>			

EX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Mya	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>2/12/20 RESPONSES SENT</p> <p>03/13/20 – ATTACHMENTS SENT</p> <p>No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator</p> <p>No. 3 – letter dated 3/13/20 – original perpetrator info from ASIR</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	N/A	04/24/20	<p>No. 4 – Sanitized images</p> <p>Responses and updated unredacted forensic reports, sanitized photos and all produced documents and Letter from original investigation unit concerning production investigation and sentencing, all bates stamped and sent</p>	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	<p>11/30/20</p> <p>Pltfs' Disclosure of experts</p>

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	redacted (black) VNS re Def RFP No. 34 120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3	attachmen ts No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis	No. 5 – 09/02/15 letter fr counseling service re number of counseling sessions No. 26 – Judgment and Order re Restitution Pymts re Gerard Jones; Judgment re Curtis; Judgment re Cragg No. 33 - all communicatio ns between plaintiffs' counsel and third parties			via dropbox Bates: 000001-000204			

EX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

			referencing litigation.						
--	--	--	-------------------------	--	--	--	--	--	--

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Pia	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>2/12/20 RESPONSES SENT</p> <p>03/13/20 – ATTACHMENTS SENT</p> <p>No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator</p> <p>No. 3 – letter dated 3/13/20 – original perpetrator info from ASIR</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	N/A	04/24/20	5/22/20	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	11/30/20 Pltfs' Disclosure of experts

20. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	of all Pltfs re redacted (black) VNS re Def RFP No. 34 120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3	attachmen ts No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis	No. 5 – 09/02/15 letter fr counseling service re number of counseling sessions No. 26 – Judgment and Order re Restitution Pymts re Gerard Jones; Judgment re Curtis; Judgment re Cragg No. 33 - all communicatio ns between plaintiffs' counsel and third parties			via dropbox Bates: 000001-000305			

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
			referencing litigation; redacted sanitized photo						

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Sally	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>02/07/20 – RESPONSES SENT</p> <p>02/27/20 – ATTACHMENTS SENT</p> <p>No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator</p> <p>No. 3 – letter dated 2/27/20 – original perpetrator</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	N/A	04/24/20 No. 4 – Sanitized images	6/4/20 Responses and updated unredacted forensic reports, sanitized photos, FBI letter re Jan_Socks, Production Perpetrator Judgment, and all produced documents bates stamped and sent via dropbox	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	11/30/20 Pltfs' Disclosure of experts

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	redacted (black) VNS re Def RFP No. 34 120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3	attachmen ts No. 1 – adoption decrees for 4 Jan_Socks victims No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis	No. 26 – Judgment Spreadsheet for Sally and Judgment Spreadsheet for Jan_Socks series No. 33 - all communicatio ns between plaintiffs' counsel and third parties referencing litigation.			Bates: 000001-000288			

~~EX.~~ 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Sarah	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>02/07/20 – RESPONSES SENT</p> <p>02/27/20 – ATTACHMENTS SENT</p> <p>No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator</p> <p>No. 3 – letter dated 2/27/20 – original perpetrator</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	N/A	04/24/20 No. 4 – Sanitized images	<p>05/29/20 Responses and updated unredacted forensic reports, sanitized photos, criminal judgment and all produced documents bates stamped and sent via dropbox</p> <p>Bates: 000001-000273</p>	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21 Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	11/30/20 Pltfs' Disclosure of experts

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

	<p>redacted (black) VNS re Def RFP No. 34</p> <p>120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3</p>	<p>attachmen ts</p> <p>No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis</p>	<p>No. 26 – Judgment Spreadsheet for Sarah</p> <p>No. 33 - all communications between plaintiffs' counsel and third parties referencing litigation.</p>						
--	---	---	---	--	--	--	--	--	--

~~EX~~. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Savannah	11/4/19 RESPONSE with no attachments 110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34 110719 – email with attachments - production of all Pltfs re	12/06/19 RESPONSES NO ATTACHMENTS 120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3 12/26/19 – Pltfs' Global supp Responses to Def 1 st RFPs with	02/07/20 – RESPONSES SENT 02/27/20 – ATTACHMENTS SENT No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator No. 3 – letter dated 2/27/20 – original perpetrator No. 4 – Attorney Series Info Report from NCMEC	N/A	04/24/20 No. 4 – Sanitized images	6/7/20 Responses and updated unredacted forensic reports, sanitized photos, FBI letter re Jan_Socks, Production Perpetrator Judgment, and all produced documents bates stamped and sent via dropbox	8/17/19 Initial Disclosures 10/28/20 Supplemental Disclosures	1/22/21 Pltfs' Global Answer to Def's 1 st set of Special Interrogatories And Pltfs' Global Responses to Def's 2 nd Rfps with no attachments	11/30/20 Pltfs' Disclosure of experts

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	<p>redacted (black) VNS re Def RFP No. 34</p> <p>120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3</p>	<p>attachmen ts</p> <p>No. 1 – adoption decrees for 4 Jan_Socks victims</p> <p>No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis</p>	<p>No. 26 – Judgment Spreadsheet for Savannah and Judgment Spreadsheet for Jan_Socks series</p> <p>No. 33 - all communicatio ns between plaintiffs' counsel and third parties referencing litigation.</p>			Bates: 000001-000287			

~~28~~. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Sierra	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>2/07/20 – RESPONSES SENT</p> <p>03/13/20 – ATTACHMENTS SENT</p> <p>No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator</p> <p>No. 3 – letter dated 3/13/20 – original perpetrator</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	N/A	04/24/20 No. 4 – Sanitized images	06/12/20 Responses and updated unredacted forensic reports, sanitized photos, FBI letter re Jan_Socks, Production Perpetrator Judgment, and all produced documents bates stamped and sent via dropbox	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	11/30/20 Pltfs' Disclosure of experts

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	<p>redacted (black) VNS re Def RFP No. 34</p> <p>120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3</p>	<p>attachmen ts</p> <p>No. 1 – adoption decrees for 4 Jan_Socks victims</p> <p>No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis</p>	<p>No. 26 – Judgment Spreadsheet for Sierra</p> <p>No. 33 - all communications between plaintiffs' counsel and third parties referencing litigation.</p>			Bates: 000001-000292			

88. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Skylar	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>2/07/20 – RESPONSES SENT</p> <p>03/13/20 – ATTACHMENTS SENT</p> <p>No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator</p> <p>No. 3 – letter dated 3/13/20 – original perpetrator</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	N/A	04/24/20 No. 4 – Sanitized images	06/08/20 Responses and updated unredacted forensic reports, sanitized photos, FBI letter re Jan_Socks, Production Perpetrator Judgment, and all produced documents bates stamped and sent via dropbox	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	11/30/20 Pltfs' Disclosure of experts

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
	<p>redacted (black) VNS re Def RFP No. 34</p> <p>120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3</p>	<p>attachmen ts</p> <p>No. 1 – adoption decrees for 4 Jan_Socks victims</p> <p>No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis</p>	<p>No. 26 – Judgment Spreadsheet for Skylar</p> <p>No. 33 - all communications between plaintiffs' counsel and third parties referencing litigation.</p>			Bates:000001-000290			

BX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Tori	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>121919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>02/07/20 - RESPONSES SENT</p> <p>03/20/20 – ATTACHMENTS SENT</p> <p>No. 1 – letter dated 12/19/19 – Real name, DOB and Original perpetrator</p> <p>No. 3 – letter dated 3/18/20 – original perpetrator with 2 cases re his prosecution</p> <p>No. 4 – Attorney</p>	<p>04/23/20 responses emailed by Carol and Ethan accepted as official service</p> <p>Corrected supplemental responses nos. 37-42.</p>	<p>05/08/20 Responses and updated unredacted forensic reports and all produced documents bates stamped and sent via dropbox</p> <p>Bates: 000001-000155</p> <p>081320 – further responses re Tori via email to Ethan and</p>	-0-	<p>8/17/19 Initial Disclosures</p> <p>10/28/20 Supplemental Disclosures</p>	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	<p>11/30/20</p> <p>Pltfs' Disclosure of experts</p>

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

	redacted (black) VNS re Def RFP No. 34	attachmen ts No. 34 – redacted and unredacted VNS notifications for plaintiffs re defendant Curtis	Series Info Report from NCMEC No. 33A – Curtis restitution request No. 33B – all communications between plaintiffs' counsel and third parties referencing litigation.		Nara after meet and confer with Ethan on 8/10/20				
--	--	--	---	--	--	--	--	--	--

BX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
Violet	<p>11/4/19 RESPONSE with no attachments</p> <p>110519 with attachments – sent email Production of all Plaintiffs re redacted (white) VNS re Def RFP No. 34</p> <p>110719 – email with attachments - production of all Pltfs re</p>	<p>12/06/19 RESPONSES NO ATTACHMENTS</p> <p>120919 – letter to opposing with real names, DOBs and original perpetrators re Def RFPs 1-3</p> <p>12/26/19 – Pltfs' Global supp Responses to Def 1st RFPs with</p>	<p>2/07/20 – RESPONSES SENT</p> <p>03/13/20 – ATTACHMENTS SENT</p> <p>No. 1 – 12/9/19 letter re real name, DOB and orig perpetrator</p> <p>No. 3 – letter dated 3/13/20 – original perpetrator</p> <p>No. 4 – Attorney Series Info Report from NCMEC</p>	N/A	04/24/20 No. 4 – Sanitized images	6/8/20 Responses and updated unredacted forensic reports, sanitized photos, Navarro Judgment, VIS re Compassionate Release and all produced documents bates stamped and sent via dropbox	8/17/19 Initial Disclosures 10/28/20 Supplemental Disclosures	<p>1/22/21</p> <p>Pltfs' Global Answer to Def's 1st set of Special Interrogatories</p> <p>And</p> <p>Pltfs' Global Responses to Def's 2nd Rfps with no attachments</p>	11/30/20 Pltfs' Disclosure of experts

Plaintiff	Pltfs Original Responses to Def 1 st RFPs	Pltfs 2 nd Responses to Def 1 st RFPs	Pltfs 3 rd Responses to Def 1 st RFPs	Pltfs' Corrected 3 rd Responses to Def 1 st RFPs	Pltfs 4 th Responses to Def 1 st RFPs	Pltfs 5 th Responses to Def 1 st RFPs	Plaintiff's Initial and Supplemental Initial Disclosures	Pltfs' Answer to Def's 1 st Set of Special Interrogatories and Pltfs' Responses to Def's 2 nd RFPs	Pltf's Disclosure of Expert Witnesses
-----------	--	---	---	--	---	---	--	--	---------------------------------------

	redacted (black) VNS re Def RFP No. 34 120919 letter to opposing with real names, DOBs and original perpetrator s for all CLH and DAB pltfs re Def RFPs 1-3	attachmen ts No. 34 – redacted and unredacted VNS notification s for plaintiffs re defendant Curtis	No. 26 – Judgment Spreadsheet for Violet No. 33 - all communications between plaintiffs' counsel and third parties referencing litigation.			Bates: 000001-000175			
--	--	--	---	--	--	----------------------	--	--	--

BX. 5 TO DEC OF SPARKS ISO PLTFS' REPLY TO MSJ

2/5/21 5:02:50 PM

COLEMAN & BALOGH LLP
ETHAN A. BALOGH, No. 172224
235 Montgomery Street, Suite 1070
San Francisco, CA 94104
Telephone: 415.391.0440
Facsimile: 415.373.3901
eab@colemanbalogh.com

Attorneys for Defendant
RANDALL CURTIS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

“AMY,” *et al.*,

Defendants,

v.

RANDALL CURTIS,

Defendant.

Case No. 19 Cv. 2184 PJH

DEFENDANT RANDALL CURTIS’S FIRST
SET OF SPECIAL INTERROGATORIES TO
EACH PLAINTIFF.

Before the Honorable Phyllis J. Hamilton
Chief United States District Judge

PROPOUNDING PARTY: DEFENDANT RANDALL CURTIS

RESPONDING PARTY: PLAINTIFF “AMY”
PLAINTIFF “ERIKI”
PLAINTIFF “TORI”
PLAINTIFF “JENNY”
PLAINTIFF “JESSICA”
PLAINTIFF “LILY”
PLAINTIFF “SARAH”
PLAINTIFF “SALLY”
PLAINTIFF “SIERRA”
PLAINTIFF “SKYLAR”
PLAINTIFF “SAVANNAH”
PLAINTIFF “MAUREEN”
PLAINTIFF “VIOLET”
PLAINTIFF “PIA”
PLAINTIFF “MYA”

SET NUMBER: ONE (1)

Pursuant to Federal Rule of Civil Procedure 33, and the express agreement from Plaintiffs respecting the service of Special Interrogatories to each Plaintiff in one set, Defendant Randall Curtis hereby propounds the following First Set of Special Interrogatories to Plaintiffs Amy, Erika, Tori, Jenny, Jessica, Lily, Sarah, Sally, Sierra, Skylar, Savannah, Maureen, Violet, Pia and Mya. It is hereby requested that Plaintiffs provide responses to the interrogatories below within thirty (30) days, pursuant to Federal Rule of Civil Procedure 33, at the offices of Coleman & Balogh LLP, 235 Montgomery Street, Suite 1070, San Francisco, CA 94104.

DEFINITIONS

Unless the context indicates otherwise, the following defined works and phrases have the meanings given:

1. “PLAINTIFF” means each individual Plaintiff as set forth in the Complaint and First Amended Complaint filed in this case: Amy, Erika, Tori, Jenny, Jessica, Lily, Sarah, Sally, Sierra, Skylar, Savannah, Maureen, Violet, Pia and Mya.

2. “CURTIS” means Defendant Randall Steven Curtis.

SPECIAL INTERROGATORIES

Set forth the date, if any, on which PLAINTIFF personally learned about the existence of Curtis.

1 **ANSWER:** Objection: this interrogatory is precluded by the Court's Order herein of October
 2 26, 20220 which affirmed the Magistrate Judge Order in all respects except ". . .to the extent that
 3 the order made findings with regard to whether plaintiffs are in fact victims of defendant's
 4 crime." The Magistrate's Order of September 9, 2020 denied defendant's motion to compel
 5 discovery as to damages,, causation, and moneys sought or received from other violators, finding
 6 that plaintiffs' election of statutory liquidated damages precluded such discovery. This
 7 interrogatory appears aimed at litigating the issue of actual damages and or causation which is,
 8 by the Court's Orders referenced above is not an issue in the case. Hence this interrogatory
 9 seeks information beyond the scope of discovery.

10
 11 /s/Carol L. Hepburn
 12 Carol L. Hepburn, WSBA No. 8732
 13 *Pro Hac Vice Admitted*

14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28
 29
 30
 31
 32
 33
 34
 35
 36
 37
 38
 39
 40
 41
 42
 43
 44
 45
 46
 47
 48
 49
 50
 51
 52
 53
 54
 55
 56
 57
 58
 59
 60
 61
 62
 63
 64
 65
 66
 67
 68
 69
 70
 71
 72
 73
 74
 75
 76
 77
 78
 79
 80
 81
 82
 83
 84
 85
 86
 87
 88
 89
 90
 91
 92
 93
 94
 95
 96
 97
 98
 99
 100
 101
 102
 103
 104
 105
 106
 107
 108
 109
 110
 111
 112
 113
 114
 115
 116
 117
 118
 119
 120
 121
 122
 123
 124
 125
 126
 127
 128
 129
 130
 131
 132
 133
 134
 135
 136
 137
 138
 139
 140
 141
 142
 143
 144
 145
 146
 147
 148
 149
 150
 151
 152
 153
 154
 155
 156
 157
 158
 159
 160
 161
 162
 163
 164
 165
 166
 167
 168
 169
 170
 171
 172
 173
 174
 175
 176
 177
 178
 179
 180
 181
 182
 183
 184
 185
 186
 187
 188
 189
 190
 191
 192
 193
 194
 195
 196
 197
 198
 199
 200
 201
 202
 203
 204
 205
 206
 207
 208
 209
 210
 211
 212
 213
 214
 215
 216
 217
 218
 219
 220
 221
 222
 223
 224
 225
 226
 227
 228
 229
 230
 231
 232
 233
 234
 235
 236
 237
 238
 239
 240
 241
 242
 243
 244
 245
 246
 247
 248
 249
 250
 251
 252
 253
 254
 255
 256
 257
 258
 259
 260
 261
 262
 263
 264
 265
 266
 267
 268
 269
 270
 271
 272
 273
 274
 275
 276
 277
 278
 279
 280
 281
 282
 283
 284
 285
 286
 287
 288
 289
 290
 291
 292
 293
 294
 295
 296
 297
 298
 299
 300
 301
 302
 303
 304
 305
 306
 307
 308
 309
 310
 311
 312
 313
 314
 315
 316
 317
 318
 319
 320
 321
 322
 323
 324
 325
 326
 327
 328
 329
 330
 331
 332
 333
 334
 335
 336
 337
 338
 339
 340
 341
 342
 343
 344
 345
 346
 347
 348
 349
 350
 351
 352
 353
 354
 355
 356
 357
 358
 359
 360
 361
 362
 363
 364
 365
 366
 367
 368
 369
 370
 371
 372
 373
 374
 375
 376
 377
 378
 379
 380
 381
 382
 383
 384
 385
 386
 387
 388
 389
 390
 391
 392
 393
 394
 395
 396
 397
 398
 399
 400
 401
 402
 403
 404
 405
 406
 407
 408
 409
 410
 411
 412
 413
 414
 415
 416
 417
 418
 419
 420
 421
 422
 423
 424
 425
 426
 427
 428
 429
 430
 431
 432
 433
 434
 435
 436
 437
 438
 439
 440
 441
 442
 443
 444
 445
 446
 447
 448
 449
 450
 451
 452
 453
 454
 455
 456
 457
 458
 459
 460
 461
 462
 463
 464
 465
 466
 467
 468
 469
 470
 471
 472
 473
 474
 475
 476
 477
 478
 479
 480
 481
 482
 483
 484
 485
 486
 487
 488
 489
 490
 491
 492
 493
 494
 495
 496
 497
 498
 499
 500
 501
 502
 503
 504
 505
 506
 507
 508
 509
 510
 511
 512
 513
 514
 515
 516
 517
 518
 519
 520
 521
 522
 523
 524
 525
 526
 527
 528
 529
 530
 531
 532
 533
 534
 535
 536
 537
 538
 539
 540
 541
 542
 543
 544
 545
 546
 547
 548
 549
 550
 551
 552
 553
 554
 555
 556
 557
 558
 559
 560
 561
 562
 563
 564
 565
 566
 567
 568
 569
 570
 571
 572
 573
 574
 575
 576
 577
 578
 579
 580
 581
 582
 583
 584
 585
 586
 587
 588
 589
 590
 591
 592
 593
 594
 595
 596
 597
 598
 599
 600
 601
 602
 603
 604
 605
 606
 607
 608
 609
 610
 611
 612
 613
 614
 615
 616
 617
 618
 619
 620
 621
 622
 623
 624
 625
 626
 627
 628
 629
 630
 631
 632
 633
 634
 635
 636
 637
 638
 639
 640
 641
 642
 643
 644
 645
 646
 647
 648
 649
 650
 651
 652
 653
 654
 655
 656
 657
 658
 659
 660
 661
 662
 663
 664
 665
 666
 667
 668
 669
 670
 671
 672
 673
 674
 675
 676
 677
 678
 679
 680
 681
 682
 683
 684
 685
 686
 687
 688
 689
 690
 691
 692
 693
 694
 695
 696
 697
 698
 699
 700
 701
 702
 703
 704
 705
 706
 707
 708
 709
 710
 711
 712
 713
 714
 715
 716
 717
 718
 719
 720
 721
 722
 723
 724
 725
 726
 727
 728
 729
 730
 731
 732
 733
 734
 735
 736
 737
 738
 739
 740
 741
 742
 743
 744
 745
 746
 747
 748
 749
 750
 751
 752
 753
 754
 755
 756
 757
 758
 759
 760
 761
 762
 763
 764
 765
 766
 767
 768
 769
 770
 771
 772
 773
 774
 775
 776
 777
 778
 779
 780
 781
 782
 783
 784
 785
 786
 787
 788
 789
 790
 791
 792
 793
 794
 795
 796
 797
 798
 799
 800
 801
 802
 803
 804
 805
 806
 807
 808
 809
 810
 811
 812
 813
 814
 815
 816
 817
 818
 819
 820
 821
 822
 823
 824
 825
 826
 827
 828
 829
 830
 831
 832
 833
 834
 835
 836
 837
 838
 839
 840
 841
 842
 843
 844
 845
 846
 847
 848
 849
 850
 851
 852
 853
 854
 855
 856
 857
 858
 859
 860
 861
 862
 863
 864
 865
 866
 867
 868
 869
 870
 871
 872
 873
 874
 875
 876
 877
 878
 879
 880
 881
 882
 883
 884
 885
 886
 887
 888
 889
 890
 891
 892
 893
 894
 895
 896
 897
 898
 899
 900
 901
 902
 903
 904
 905
 906
 907
 908
 909
 910
 911
 912
 913
 914
 915
 916
 917
 918
 919
 920
 921
 922
 923
 924
 925
 926
 927
 928
 929
 930
 931
 932
 933
 934
 935
 936
 937
 938
 939
 940
 941
 942
 943
 944
 945
 946
 947
 948
 949
 950
 951
 952
 953
 954
 955
 956
 957
 958
 959
 960
 961
 962
 963
 964
 965
 966
 967
 968
 969
 970
 971
 972
 973
 974
 975
 976
 977
 978
 979
 980
 981
 982
 983
 984
 985
 986
 987
 988
 989
 990
 991
 992
 993
 994
 995
 996
 997
 998
 999
 1000

Respectfully submitted,

/s/ E A Balogh
 ETHAN A. BALOGH
 Attorneys for Defendant

Dated this _____ day of January, 2021.

/s/ John A. Kawai
 John A. Kawai, CSBN 260120
 CARPENTER, ZUCKERMAN & ROWLEY
 407 Bryant Circle, Suite F
 Ojai, CA 93023
 Phone: 805-272-4001
 Email: jk@czrlaw.com
 Attorney for Plaintiffs

/s/ Carol L. Hepburn
 Carol L. Hepburn, *Pro Hac Vice*
 CAROL L. HEPBURN, P.S.
 200 First Ave.
 Seattle, WA 98119
 Phone: 206-957-7272
 Email: carol@hepburnlaw.net

1 Attorney for Plaintiffs Maureen,
2 Pia, Ava, Lily, Sarah, Skylar, Savannah,
3 Sally, Sierra, Violet, Amy, Erika, Tori, Jenny and
4 Jessica

5 /s/ Deborah A. Bianco

6 Deborah A. Bianco, *Pro Hac Vice*

7 DEBORAH A. BIANCO, PLLC

8 14535 Bel-Red Road, #201

9 Bellevue, WA 98007

10 Phone: 425-747-4500

11 Email: deb@debbiancolaw.com

12 Attorney for Plaintiffs Maureen, Pia and
13 Mya
14
15
16
17
18
19
20
21
22
23
24
25
26
27

PROOF OF SERVICE

I HEREBY CERTIFY that today I caused a true and correct copy of Defendant Randall Curtis's First Set of Special Interrogatories to Each Plaintiff to be electronically mailed to counsel for Plaintiffs at the email addresses set forth below.

John A. Kawai
Carpenter, Zuckerman & Rowley
407 Bryant Circle, Suite F
Ojai, CA. 93023
Email: jk@czrlaw.com

Deborah A. Bianco, *Pro Hac Vice*
PO Box 6503
Bellevue, WA. 98008
Email: deb@debbiancolaw.com

Carol L. Hepburn
PO Box 17718
Seattle, WA. 98103
Email: carol@hepburnlaw.net

Dated: October 9, 2019

/s/ E. A. Balogh
ETHAN A. BALOGH

COLEMAN & BALOGH LLP
ETHAN A. BALOGH, No. 172224
235 Montgomery Street, Suite 1070
San Francisco, CA 94104
Telephone: 415.391.0440
Facsimile: 415.373.3901
eab@colemanbalogh.com

Attorneys for Defendant
RANDALL CURTIS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

“AMY,” “ERIK,” JANE SMITH, as
next of friend for “TORI,” minor,
“JENNY,” and “JESSICA,” “LILY,”
“SARAH,” JOHN DOE as court
appointed conservator for “SIERRA,”
and “SALLY,” minors, JANE DOE as
court appointed conservator for
“SKYLAR” and “SAVANNAH,”
minors, “MAUREEN,” WILLIAM L.E
DUSSAULT as Guardian ad Litem for
“VIOLET,” minor, JANE ROE, as next
of friend for “PIA,” a minor and
“MYA,”

Plaintiffs,

v.

RANDALL STEVEN CURTIS,

Defendant.

Case No: 3:19-CV-01897-VC

DEFENDANT RANDALL CURTIS’S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS TO EACH PLAINTIFF AND
PLAINTIFFS RESPONSES THERETO

Before the Honorable Phyllis J. Hamilton
Chief United States District Judge

PROPOUNDING PARTY: DEFENDANT RANDALL CURTIS
RESPONDING PARTY: PLAINTIFF “AMY”
PLAINTIFF “ERIK”
PLAINTIFF “TORI”

1 PLAINTIFF “JENNY”
2 PLAINTIFF “JESSICA”
3 PLAINTIFF “LILY”
4 PLAINTIFF “SARAH”
5 PLAINTIFF “SALLY”
6 PLAINTIFF “SIERRA”
7 PLAINTIFF “SKYLAR”
8 PLAINTIFF “SAVANNAH”
9 PLAINTIFF “MAUREEN”
10 PLAINTIFF “VIOLET”
11 PLAINTIFF “PIA”
12 PLAINTIFF “MYA”

13 SET NUMBER: TWO (2)

14 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the express
15 agreement from Plaintiffs with respect to combining this Set Two of Requests for Production ion
16 one document, Defendant Randall Curtis requests that each Plaintiff produce for inspection and
17 copying all documents and things requested herein within thirty (30) days of service in
18 accordance with the definitions and instructions set forth below. Production of documents and
19 things shall be at Coleman & Balogh LLP, 235 Montgomery Street, Suite 1070, San Francisco,
20 CA 94104.

21 DEFINITIONS

22 In addition to the definitions set forth in the Federal Rules of Civil Procedure, the
23 following definitions apply to each of the Requests, and are deemed to be incorporated in each of
24 said Requests:

25 1. “All” should be construed to include the collective as well as the singular and shall
26 mean “each,” “any,” and “every.”

27 2. “Any” shall be construed to mean “any and all.”

28 3. “Communication” means without limitation, oral or written communications of any
kind, such as electronic communications, e-mails, facsimiles, telephone communications,

1 correspondence, exchange of written or recorded information, or face-to-face meetings. The
2 phrase “communication between” is defined to include instances where one party addresses the
3 other party but the other party does not necessarily respond.
4

5 4. “Date” means the exact day, month and year, if ascertainable, or the best available
6 approximation, including any relationship to other known events (designate whether exact or
7 approximate).
8

9 5. “Plaintiff” means each individual plaintiff as she identified herself in the Complaint
10 and First Amended Complaint, *i.e.*, Amy, Erika, Tori, Sally, Jessica, Jenny, Lily, Sarah, Sierra,
11 Skylar, Savannah, Maureen, Violet, Pia, and Mya.
12

13 6. “Document” means without limitation, the original and all non-identical copies of all
14 items subject to discovery under Rule 34 of the Federal Rules of Civil Procedure. This
15 definition includes, without limitation, letters, correspondence, manuscripts, drafts, novels, short
16 stories, works of fiction, works of nonfiction, memoranda, legal pleadings, calendars, diaries,
17 travel records, summaries, records of telephone conversations, telegrams, notes, reports,
18 compilations, notebooks, work papers, graphs, charts, blueprints, books, pamphlets, brochures,
19 circulars, manuals, instructions, ledgers, drawings, sketches, photographs, videotapes,
20 audiotapes, screenshots, data files, film and sound reproductions, e-mails, internal or external
21 web sites, compact discs, computer files and disks, sales, advertising and promotional literature,
22 agreements, stored recordings, minutes or other records of meetings, all written or graphic
23 records or representations of any kind, and all mechanical or Electronic Data, records or
24 representations of any kind.
25

26 7. “Electronic Data” includes, without limitation, the following:
27

28 a. activity listings of electronic mail receipts and/or transmittals;

1 b. output resulting from the use of any software program, including, without
2 limitation, word processing Documents, spreadsheets, database files, charts, graphs and
3 outlines, electronic mail, GChat (or similar program) or bulletin board programs, SMS or text
4 messages (including third party SMS services such as WhatsApp), operating systems, source
5 code, PRF files, PRC files, batch files, ASCII files, and all miscellaneous media on which they
6 reside and regardless of whether said electronic data exists in an active file, a deleted file, or file
7 fragment;
8

9 c. any and all items stored on computer memories, hard disks, floppy disks,
10 CDROM, magnetic tape, microfiche, thumb drives, or in any other vehicle for digital data
11 storage and/or transmittal, such as, but not limited to, a personal digital assistant, e.g.,
12 Blackberry, Smart Phone, or similar device, and file folder tabs, and/or containers and labels
13 appended to, or relating to, any physical storage device associated with each original and/or
14 copy of all Documents requested herein.
15

16 8. “Including” is used to emphasize certain types of Documents requested and should not
17 be construed as limiting the request in any way.
18

19 9. “Person” or “Persons” is defined to mean any natural person, corporation, or
20 partnership, proprietorship, joint venture, or any business, legal, or government entity,
21 organization, or association.
22

23 10. “Or” and “and” should be construed so as to require the broadest possible response.
24 If, for example, a request calls for information about “A or B” or “A and B,” You should
25 produce all information about any and all information about B, as well as all information about A
26 and B collectively. In other words, “or” and “and” should be read as “and/or.”
27

28 11. “Relating to,” “referring to,” “regarding,” or “with respect to” mean, without

1 limitation, the following concepts: discussing, describing, reflecting, dealing with, pertaining to,
2 analyzing, evaluating, estimating, constituting, studying, surveying, projecting, assessing,
3 recording, summarizing, criticizing, reporting, commenting, or otherwise involving, in whole or
4 in part.
5

6 12. “You” or “Your” mean the responding Plaintiff, together with all present and former
7 agents, representatives, attorneys, or any other persons acting or purporting to act on behalf of
8 the responding Plaintiff.

9 13. You should construe negative terms to include the positive, and vice-versa. For
10 example, You should construe the word “preference” to mean preference or lack of preference.
11

12 14. Unless words or terms have been given a specific definition herein, each word or term
13 used herein shall be given its usual and customary dictionary definition.

14 15. Where it is necessary to bring within the scope of these Requests information that
15 might otherwise be construed to be outside their scope, the use of a verb in any tense shall be
16 recognized as the use of that verb in all other tenses.
17

18 16. “Member of United States Congress” means any elected federal Congressman or
19 Congresswoman, including the Congressman’s/Congresswoman’s staff and any other persons
20 acting or purporting to act on behalf of the Congressman/Congresswoman.

21 17. “Member of the United States Senate” means any elected federal Senator, including
22 the Senator’s staff and any other persons acting or purporting to act on behalf of the Senator.
23

24 INSTRUCTIONS

25 1. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, these Document
26 requests are continuing in nature so that if You subsequently discover or obtain possession,
27 custody, or control of any Document covered by these requests, You shall promptly make any
28

1 such Document available to Defendant.

2 2. In producing Documents and other materials, You are to furnish all Documents or
3 things in Your possession, custody or control, regardless of whether such Documents or
4 materials are possessed directly by You or Your agents, investigators or by Your attorneys or
5 their Employees, agents or investigators.
6

7 3. Pursuant to Rule 34(b) of the Federal Rules of Civil Procedure, all Documents shall be
8 produced in the same order as they are kept or maintained by You. All Documents shall be
9 produced in the file folder, envelope or other container in which the Documents are kept or
10 maintained. If for any reason the container cannot be produced, You should produce copies of all
11 labels or other identifying marks which may be present on the container.
12

13 4. Documents shall be produced in such fashion as to identify the office in whose
14 possession they were located and, where applicable, the natural person in whose possession they
15 were found and the business address of each Document(s) custodian(s).
16

17 5. Documents attached to one another should not be separated. If any portion of any
18 Document is responsive to any portion of the Document requests below, then the entire
19 Document must be produced.

20 6. If a Document once existed and subsequently has been lost, destroyed or is otherwise
21 missing, You should provide sufficient information to identify the Document and state, in
22 writing, the details, including whether the Document: a. is lost or missing; b. has been destroyed
23 and, if so, by whom at whose request; c. has been transferred or delivered, voluntarily or
24 involuntarily, to another person or entity and at whose request; and/or d. has been otherwise
25 disposed of.
26

27 7. In each instance in which a Document once existed and subsequently is lost, missing,
28

1 destroyed, or otherwise disposed of, explain the circumstances surrounding the disposition of the
2 Document, including, but not limited to: a. the identity of the Person or entity who last possessed
3 the Document; b. the date or approximate date of the Document's disposition; and c. the identity
4 of all Persons who have or had knowledge of the Document's contents.
5

6 8. If any Document responsive to any of these requests is privileged, and the Document
7 or any portion of the Document requested is withheld based on a claim of privilege pursuant to
8 Rule 26(b)(5) of the Federal Rules of Civil Procedure, provide a statement of the claim of
9 privilege and any facts relied upon in support of that claim, including the following information:
10 a. the reason for withholding the Document; b. the date of such Communication; c. the medium
11 of such Communication; d. the general subject matter of such Communication (such description
12 shall not be considered a waiver of Your claimed privilege); e. the identity of any Document that
13 was the subject of such Communication and the present location of any such Document; and f.
14 the identity of the Persons involved in such Communication.
15

16 9. Each Document requested herein should be produced in its entirety and without
17 deletion, redaction or excisions, except as qualified by Instruction 8 above, regardless of whether
18 You consider the entire Document or only part of it to be relevant or responsive to these
19 Document requests. If You have redacted any portion of a Document, stamp the word
20 "REDACTED" beside the redacted information on each page of the Document which You have
21 redacted. Any redactions to Documents produced should be identified in accordance with
22 Instruction 8 above.
23
24

25 10. All headings used in the Requests are for organizational purposes only, and are not
26 intended, and shall not be construed, to modify any request in any manner, and shall not be used
27 in any way to restrict or limit the scope of any request set forth beneath any particular heading.
28

1 11. Any document request that demands the production of “documents sufficient to
2 show” requires You to produce only those documents necessary to provide all the information
3 necessary to show, identify or describe the subject matter requested.
4

5 12. If identical copies of a document are in the possession, custody or control of more
6 than one natural person or other document custodian, a copy of that document shall be produced
7 from each such natural person or other document custodian.

8 13. In instances where two or more exact duplicates of any document exist, the most
9 legible copy shall be produced.
10

11 14. The fact that a document is in the possession of Plaintiffs, or is produced by another
12 Person, does not relieve You of the obligation to produce all of Your copies of the same
13 document, even if Your copies are identical in all respects to a document produced or held by
14 another Person.

15 15. If You file a timely objection to any portion of a Request, definition or instruction,
16 provide a response to the remaining portion.
17

18 16. The time period to which these Requests refer (i.e., the “relevant period”) is from the
19 date of the sexual abuse you allege in the Complaint to the present. If any document is undated
20 and the date of its preparation cannot be determined, the document shall be produced if otherwise
21 responsive to any of the Requests.
22

23 17. All Documents shall be produced electronically, with hard copy documents produced
24 in the form of searchable linked TIFF images and electronically stored information as native files
25 and/or searchable TIFF images for each document linked to the document’s associated metadata
26 and extracted text or OCR. All documents produced shall be produced as they are kept in the
27 ordinary course. You shall identify the source from which each document was produced,
28

1 including, if applicable, the name of the individual or general files from which the document was
2 produced. Documents that are segregated or separated from other documents whether by use of
3 binders, files, sub-files, or by dividers, tabs, folders or any other method, shall be left so
4 segregated or separated. All labels or markings on any such binders, files, sub-files, dividers,
5 tabs or folders shall be produced. The custodian and source folder or file for each document
6 produced should be included in the appropriate metadata field.
7

8 18. All Documents produced should be Bates numbered sequentially, with a unique
9 number on each page, and with a prefix identifying the party producing the Document.
10

11 19. Any alteration of a responsive document, including any marginal notes, handwritten
12 notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions,
13 modifications and other versions of a document is a responsive document in its own right and
14 must be produced.
15

16 REQUESTS FOR PRODUCTION

17 **REQUEST 50.** All documents reflecting any and all Communication You sent to any Member
18 of the United States Congress related to amending 18 U.S.C. § 2255.

19 **RESPONSE:** Objection: beyond the scope of permissible discovery as not likely to lead to any
20 admissible evidence; violative of Plaintiffs' First Amendment rights to petition Congress as the
21 compelled disclosure of communications as requested exerts a chilling effect on the exercise of
22 those rights. Further, Defendant's request is violative of California Code of Civil Procedure
23 425.16 which prohibits actions "... against a person arising from any act of that person in
24 furtherance of the person's right of petition or free speech under the United States Constitution
25 or the California constitution in connection with a public issue . . ."

26 */s/Carol L. Hepburn*

27 Carol L. Hepburn, WSBA No. 8732

28 *Pro Hac Vice Admitted*

1 **REQUEST 51.** All documents reflecting any and all Communication You sent to any Member
2 of the United States Senate related to amending 18 U.S.C. § 2255.

3 **RESPONSE:** Objection: beyond the scope of permissible discovery as not likely to lead to any
4 admissible evidence; violative of Plaintiffs' First Amendment rights to petition Congress as the
5 compelled disclosure of communications as requested exerts a chilling effect on the exercise of
6 those rights. Further, Defendant's request is violative of California Code of Civil Procedure
7 425.16 which prohibits actions "... against a person arising from any act of that person in
8 furtherance of the person's right of petition or free speech under the United States Constitution
9 or the California constitution in connection with a public issue . . ."

10 */s/Carol L. Hepburn*
11 Carol L. Hepburn, WSBA No. 8732
12 *Pro Hac Vice Admitted*

13 **REQUEST 52.** All documents reflecting any and all Communication You received from any
14 Member of the United States Congress related to amending 18 U.S.C. § 2255.

15 **RESPONSE:** Objection: beyond the scope of permissible discovery as not likely to lead to any
16 admissible evidence; violative of Plaintiffs' First Amendment rights to petition Congress as the
17 compelled disclosure of communications as requested exerts a chilling effect on the exercise of
18 those rights. Further, Defendant's request is violative of California Code of Civil Procedure
19 425.16 which prohibits actions "... against a person arising from any act of that person in
20 furtherance of the person's right of petition or free speech under the United States Constitution
21 or the California constitution in connection with a public issue . . ."

22 */s/Carol L. Hepburn*
23 Carol L. Hepburn, WSBA No. 8732
24 *Pro Hac Vice Admitted*

25 **REQUEST 53.** All documents reflecting any and all Communication You received from any
26 Member of the United States Senate related to amending 18 U.S.C. § 2255.

27 **RESPONSE:** Objection: beyond the scope of permissible discovery as not likely to lead to any
28 admissible evidence; violative of Plaintiffs' First Amendment rights to petition Congress as the

1 compelled disclosure of communications as requested exerts a chilling effect on the exercise of
2 those rights. Further, Defendant's request is violative of California Code of Civil Procedure
3 425.16 which prohibits actions ". . . against a person arising from any act of that person in
4 furtherance of the person's right of petition or free speech under the United States Constitution
5 or the California constitution in connection with a public issue . . ."

6 */s/Carol L. Hepburn*

7 Carol L. Hepburn, WSBA No. 8732

8 *Pro Hac Vice Admitted*

9 Respectfully submitted,

10 DATED: October 29, 2020

11 COLEMAN & BALOGH LLP

12 */s/ E A Balogh*

13 By: ETHAN A. BALOGH

14 235 Montgomery Street, Suite 1070

15 San Francisco, CA 94104

16 Direct: 415.391.0441

17 Attorneys for Defendant

18 RANDALL CURTIS

PROOF OF SERVICE

I HEREBY CERTIFY that today I caused a true and correct copy of Defendant Randall Curtis's First Set of Special Interrogatories to Each Plaintiff to be electronically mailed to counsel for Plaintiffs at the email addresses set forth below.

John A. Kawai
Carpenter, Zuckerman & Rowley
407 Bryant Circle, Suite F
Ojai, CA. 93023
Email: jk@czrlaw.com

Deborah A. Bianco, *Pro Hac Vice*
PO Box 6503
Bellevue, WA. 98008
Email: deb@debbiancolaw.com

Carol L. Hepburn
PO Box 17718
Seattle, WA. 98103
Email: carol@hepburnlaw.net

Dated: October 29, 2019

/s/ E. A. Balogh
ETHAN A. BALOGH

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

John A. Kawai, CSBN 260120
 CARPENTER, ZUCKERMAN & ROWLEY
 407 Bryant Circle, Suite F,
 Ojai, CA 93023
 Tel: (805) 272-4001
 Fax: (805) 719-6858
 Email: jk@czrlaw.com
 Of Attorneys for Plaintiffs

Deborah A. Bianco, Pro Hac Vice
 PO Box 6503
 Bellevue, WA 98008
 (425) 747-4500
 Email: deb@debbiancolaw.com
 Attorney for Plaintiffs Maureen, Pia,
 And Mya

Carol L. Hepburn, Pro Hac Vice
 PO Box 17718
 Seattle, WA 98127
 Tel: 206) 957-7272
 Fax: (206) 957-7273
 Email: carol@hepburnlaw.net
 Attorney for Plaintiffs Lily, Sarah,
 Skylar, Savannah, Sally, Sierra, Violet,
 Amy, Erika, Tori, Jenny, and Jessica

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

) "AMY," "ERIKA," JANE SMITH, as next of friend for "TORI," minor, "JENNY," and "JESSICA," "LILY," "SARAH," JOHN DOE as court appointed conservator for "SIERRA," and "SALLY," minors, JANE DOE as court appointed conservator for "SKYLAR" and "SAVANNAH," minors, "MAUREEN," WILLIAM L.E DUSSAULT as Guardian ad Litem for "VIOLET," minor, JANE ROE, as next of friend for "PIA," and "MYA," minors,)) Plaintiffs,)))	Case Number: 3:19-cv-02184-PJH PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1) REQUIRED INITIAL DISCLOSURES
---	---

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
 REQUIRED INITIAL DISCLOSURES - 1

CAROL L. HEPBURN, P.S.
 ATTORNEYS AT LAW
 PO Box 17718
 SEATTLE, WA 98127
 TEL: (206) 957-7272 / FAX: (206) 957-7273

1 v.)
 2)
 3 RANDALL STEVEN CURTIS,)
 4)
 5 Defendant.)
 6)
 7)
 8)
 9)
 10)
 11)
 12)

7 Plaintiffs Amy, Erika, Jane Smith as next of friend for Tori, minor, Jenny, Jessica, Lily,
 8 Sarah, John Doe as court appointed conservator for Sierra and Sally, minors, Jane Doe as court
 9 appointed conservator of Skylar and Savannah, minors, Maureen, William L.E. Dussault as
 10 Guardian ad Litem for Violet, minor, Jane Roe, as next of friend for Pia and Mya, (collectively as
 11 “Plaintiffs”) make the following initial disclosures as required by Fed. R. Civ. P. 26(a).
 12

13 These disclosures are based upon, and therefore limited by, records and information in
 14 existence, presently recollected, and thus far discovered in the course of preparing these
 15 disclosures. Plaintiffs reserve the right to supplement and/or amend these disclosures due to
 16 inadvertent errors or omissions or if additional or more accurate information becomes available.
 17

18 **A. NAME, ADDRESS, AND TELEPHONE NUMBER OF EACH INDIVIDUAL**
 19 **LIKELY TO HAVE DISCOVERABLE INFORMATION**
 20 **(Fed. R. Civ. P. 26(a)(1)(A)(i)**

21 The following person(s) are likely to have discoverable information that the Plaintiffs
 22 may use to support their claims or defenses:

23 **Shailika Shah Kotiya**
 24 United States Attorney's Office
 25 Northern District of California
 26 450 Golden Gate Avenue
 11th Floor
 San Francisco, CA 94102
 415-436-7443

27 PLAINTIFFS’ SUPPLEMENTAL RULE 26(a)(1)
 28 REQUIRED INITIAL DISCLOSURES - 2

CAROL L. HEPBURN, P.S.
 ATTORNEYS AT LAW
 PO Box 17718
 SEATTLE, WA 98127
 TEL: (206) 957-7272 / FAX: (206) 957-7273

1 Julie Garcia
2 United States Attorney's Office
3 Southern District of Ohio
Cincinnati, OH 45202

4 Ms. Kotiya and Ms. Garcia may have knowledge of the facts of defendant's offense(s), of
5 the investigation of the offense(s), the criminal prosecution, the discovery conducted and/or
6 provided to defendant during the course of the prosecution, which forms the basis of this case,
7 and the Defendant's subsequent conviction, sentence, and entry of the restitution stipulation and
8 order..
9

10 **Special Agent Jason Popper**
11 Department of Homeland Security Immigration and Customs Enforcement
12 Jason.popper@ice.dhs.gov
415-844-5301

13 **Special Agent Michael Kress**
14 Homeland Security Investigations
15 San Francisco International Airport
(415) 844-0815
16

17 Group Supervisor Agent Christina Barfuss
18 Cyber Crimes Child Exploitation
19 Department of Homeland Security
20 630 Sansome Street
San Francisco, CA 94111

21 Agents Popper, Kress, and Barfuss, and additional law enforcement agents involved in
22 the investigation and prosecution of the Defendant which, on information and belief, include
23 those from the Department of Homeland Security as revealed in the discovery provided to
24 Defendant in the course of the criminal prosecution, including but not limited to retired Agent
25

26
27 PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
28 REQUIRED INITIAL DISCLOSURES - 3

CAROL L. HEPBURN, P.S.
ATTORNEYS AT LAW
PO Box 17718
SEATTLE, WA 98127
TEL: (206) 957-7272 / FAX: (206) 957-7273

1 Jerald Kawai whose current location is unknown to Plaintiffs, as well as related and affiliated
2 Federal Bureau of Investigation officers and special agents.

3 Special Agent Christina Barfuss is the Group Supervisor of Homeland Security Cyber
4 Crimes/Child Exploitation Cyber Crimes Investigations Center. She may have knowledge of the
5 request for ECD Technical Assistance at NCMEC that files be reviewed for any known child
6 victims that were identified by law enforcement in past investigations in the form of a DVD
7 obtained from Randall Steven Curtis.
8

9 These law enforcement agents may have knowledge of facts of the criminal offenses and
10 investigation of those offenses which underlie this civil matter.
11

12 **Special Agent Madonia**
Homeland Security
13

14 Special Agent Madonia received one (1) DVD from the submitting agent. A formal
15 request was made that the files be reviewed for any known child sex abuse image exploitation
16 victims that were identified by law enforcement in past investigations.
17

18 **Special Agent Kristina Eyler**
703-675-9760
19

20 Special Agent Eyler transferred evidence to HSI office in Washington, DC.

21 **Shawn Halbert**
22 Law Offices of Shawn Halbert
214 Duboce Avenue
23 San Francisco, CA. 94103
24 Phone: 415-703-0993

25 And
26

27 PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
28 REQUIRED INITIAL DISCLOSURES - 4

CAROL L. HEPBURN, P.S.
ATTORNEYS AT LAW
PO Box 17718
SEATTLE, WA 98127
TEL: (206) 957-7272 / FAX: (206) 957-7273

1 **Ethan A. Balogh**

2 Coleman & Balogh, LLP
3 235 Montgomery Street, Suite 1070
4 San Francisco, CA. 94104
5 Phone: 415-391-0440

6 Ms. Halbert and Mr. Balogh may have knowledge of the facts of the Defendant's
7 offense(s), the investigation of the offense(s), the criminal prosecution, and the discovery
8 provided to the Defendant during the course of the prosecution which forms the predicate
9 criminal conduct for this case.

10 **Defendant Randall Steven Curtis**

11 Register No.: 24061-111
12 FCI Beaumont (Low)
13 PO Box 26025
14 Beaumont, TX. 77720-6025

15 The Defendant has knowledge of the facts and circumstances of his own conduct and
16 criminal offense(s), the investigation of the offense(s), the criminal prosecution, the discovery
17 conducted and provided to him and his attorney during the course of the prosecution which
18 forms the basis of this case. The Defendant also has knowledge of his assets and resources
19 available to satisfy all or part of any judgment.

20 **Kevin J. Laws**

21 K&S Teaching and Consulting LLC
22 10816 Crest Street
23 Fairfax, VA 22030
24 Phone: 703-473-9499

25 Based on his extensive education, training, and experience concerning the investigation
26 of child sex abuse image exploitation crimes, Mr. Laws is familiar with the images/videos
27 discovered during the investigation of the Defendant's predicate criminal activity which forms
28 the basis for this case, and can identify the individual Plaintiffs depicted in the images/videos

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
REQUIRED INITIAL DISCLOSURES - 5

CAROL L. HEPBURN, P.S.

ATTORNEYS AT LAW

PO Box 17718

SEATTLE, WA 98127

TEL: (206) 957-7272 / FAX: (206) 957-7273

1 discovered during the investigation of the Defendant's predicate criminal acts. Mr. Laws has
 2 viewed the child sex abuse material which is included in the evidence of the underlying criminal
 3 investigation and has met with each of the plaintiffs herein. It is anticipated that Mr. Laws will
 4 offer testimony on identification of Plaintiffs' images within Defendant's collection of child
 5 pornography.
 6

7 **Lauren Coffren**

8 Director of the Exploited Children Division of NCMEC
 9 National Center for Missing and Exploited Children
 10 333 John Carlyle Street, Suite 125
 Alexandria, VA. 22314-5950
 703-224-2150

11 Ms. Coffren is the Director of the Exploited Children Division of NCMEC and is
 12 responsible for overseeing the ECD's Child Victim Identification Program (CVIP) analysts and
 13 support personnel. She has knowledge of the procedures involving CVIP reports and their
 14 processing by NCMEC, including the procedures used to generate and maintain reports.
 15

16 **Signy Arnason**

17 Associate Executive Director
 18 Canadian Centre for Child Protection
 615 Academy Road
 19 Winnipeg, MB R3N 0E7
 Canada
 20 1-800-532-9135

21 Ms. Arnason, the Associate Executive Director from the Canadian Centre for Child
 22 Protection has knowledge of the hash values of the child pornography images and/or videos of
 23 each of the plaintiffs herein, the circulation of the images and/or videos of each Plaintiff and can
 24 identify some of the plaintiffs in the child pornography possessed by Defendant Randall Steven
 25 Curtis.
 26

27 PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
 28 REQUIRED INITIAL DISCLOSURES - 6

CAROL L. HEPBURN, P.S.
 ATTORNEYS AT LAW
 PO Box 17718
 SEATTLE, WA 98127
 TEL: (206) 957-7272 / FAX: (206) 957-7273

Matthew Stein

ECD Staff

NCMEC

333 John Carlyle Street, Suite 125

Alexandria, VA. 22314-5950

703-224-2150

Mr. Stein has knowledge that child pornography images were identified as a result of additional analysis and searches of ECD Technical Assistance of NCMEC from files obtained from the criminal investigation of Randall Steven Curtis.

SA Jeffrey Stetler

Agency: Federal Bureau of Investigation

Email: jfstetler@fbi.gov

Phone Number: 360-239-9300

Special Agent Scott Saxon - retired

FBI

Scott.saxon@ic.fbi.gov

Special Agent Stetler is the current, and Special Agent Saxon is the former Law Enforcement Point of Contact regarding the At School series victim, Case No. [REDACTED]

[REDACTED] They are familiar with the images/videos in this series and able to verify Violet's identity and age.

Special Agent Tina Fourkas

FBI

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
REQUIRED INITIAL DISCLOSURES - 7

CAROL L. HEPBURN, P.S.

ATTORNEYS AT LAW

PO Box 17718

SEATTLE, WA 98127

TEL: (206) 957-7272 / FAX: (206) 957-7273

1 Tina.fourkas@ic.fbi.gov

2 Special Agent Fourkas is the former Law Enforcement Point of Contact regarding the
3 four victims of the Jan_Socks series, Sierra, Sally, Skylar and Savannah, Case No. [REDACTED]

4 [REDACTED] She is familiar with the images/videos in this series and able to verify their identities and
5 ages. She is not at this time performing point of contact duties with regard to this series and will
6 not be called as a witness in this case. She is listed here as she is a person with knowledge who
7 is known to Plaintiffs' counsel.
8

9
10
11 Special Agent Adam L. Krob
12 Special Agent Allison Hirsch
13 FBI – [REDACTED]
14 alkrob@fbi.gov
alhirsch2@fbi.gov

15 Special Agents Krob and Hirsch are the current Law Enforcement Points of Contact
16 regarding the four victims of the Jan_Socks series, Sierra, Sally, Skylar and Savannah, Case No.
17 [REDACTED]. They are familiar with the images/videos in this series and will be able to
18 verify the identities and ages of Sierra, Sally, Skylar and Savannah. It is anticipated that Agent
19 Krob may be called as a witness herein.
20

21 **Special Agent Daniel Ben-Meir**
22 Department of Homeland Security Immigration and Customs Enforcement
23 [REDACTED]
Daniel.ben-meir@ice.dhs.gov

1 Special Agent Ben-Meir is the Law Enforcement Point of Contact regarding the victim of
2 the Jenny Series, Case No. [REDACTED]. He is familiar with the images/videos in this
3 series and able to verify Jenny's identity and age.
4

5 Detective Daniel Fandrey
6 Agency: [REDACTED] County Police Department
7 Email: [daniel.fandrey@\[REDACTED\].gov](mailto:daniel.fandrey@[REDACTED].gov)

8 and

9 **Detective Rory Forrestal - retired**
10 [REDACTED] County Police Department, Computer Crimes
11 [ForreRoi@\[REDACTED\].gov](mailto:ForreRoi@[REDACTED].gov)

12 Detective Fandry is the current, and Detective Forrestal is the former, Law Enforcement
13 Point of Contact regarding the victim of the Jessica Series, Case No. [REDACTED]. They are
14 familiar with the images/videos in this series and able to verify Jessica's identity and age.
15

16 **Detective Andy Byers - retired**
17 [REDACTED] State Police
18 (Currently on leave)
19 [abyers@\[REDACTED\].gov](mailto:abyers@[REDACTED].gov)

20 and/or

21 **SSA J. Thomas Rothrock, retired**
22 Department of Homeland Security Immigrations and Customs Enforcement
23 [REDACTED]

24 Supervisory Special Agent Rothrock is at this time the Law Enforcement Point of Contact
25 regarding Maureen of the Lighthouse Series, Case No. [REDACTED]. SSA Rothrock and Det. Byers
26 were involved in the original rescue and production case related to the Lighthouse series, are

27 PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
28 REQUIRED INITIAL DISCLOSURES - 9

CAROL L. HEPBURN, P.S.
ATTORNEYS AT LAW
PO Box 17718
SEATTLE, WA 98127
TEL: (206) 957-7272 / FAX: (206) 957-7273

familiar with the images/videos in this series and able to verify Maureen's identity and age. Agent Byers is currently on leave and is not performing any duties relative to the Lighthouse case. He will not be called as a witness in this matter, but is listed here as he is a person with knowledge who is known to Plaintiffs' counsel.

Detective Deborah Behymer - retired

[REDACTED] County Sheriff's Office

[REDACTED]
debbiebehymmer@yahoo.com

Retired Detective Behymer is the Law Enforcement Point of Contact regarding Sarah of the Marineland Series. She is familiar with the images/videos in this series and able to verify Sarah's identity and age.

SA Kevin Shanley

FBI

[REDACTED]
Kevin.shanley@ic.fbi.gov

Special Agent Shanley is the Law Enforcement Point of Contact regarding Amy of the Misty Series. He is familiar with the images/videos in this series and able to verify her identity and age.

SA Jamie West

Department of Homeland Security Immigration and Customs Enforcement

[REDACTED]
Jamie.west@dhs.gov

Case No. [REDACTED]

And/or

Detective Sergeant John Merrigan

[REDACTED] State Police – [REDACTED]

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
REQUIRED INITIAL DISCLOSURES - 10

CAROL L. HEPBURN, P.S.

ATTORNEYS AT LAW

PO Box 17718

SEATTLE, WA 98127

TEL: (206) 957-7272 / FAX: (206) 957-7273

Case No. [REDACTED]

Special Agent West and/or Detective Sergeant John Merrigan are the Law Enforcement Points of Contact regarding Erika and Tori of the PinkHeartSisters Series. SA West and Detective Sergeant Merrigan are familiar with the images/videos in this series and able to verify their identities and ages.

Corporal Amanda Garner
Corporal Adelle Brown
Constable Lana Chui
Sergeant Natalie Davis
E Division Major Crime Section

Or

Integrated Child Exploitation
Victim Identification Unit

Corporals Garner and Brown, Constable Chui, and Sgt. Natalie Davis or the Victim Identification Unit of the Integrated Child Exploitation Unit of the [REDACTED]

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
REQUIRED INITIAL DISCLOSURES - 11

CAROL L. HEPBURN, P.S.
ATTORNEYS AT LAW
PO Box 17718
SEATTLE, WA 98127
TEL: (206) 957-7272 / FAX: (206) 957-7273

1 [REDACTED] are the Law Enforcement Points of Contact regarding Pia and Mya of the Sweet Sugar
2 Series. They are familiar with the images/videos in this series and able to verify Pia's and Mya's
3 identities and ages.
4

5 **And**

6 **Sgt. Bev Csikos – former LEPOC**
7 [REDACTED]
8 [REDACTED]
9 Case No. [REDACTED]

10 Sgt. Csikos of the [REDACTED] is the former Law Enforcement Point
11 of Contact regarding Pia and Mya of the Sweet Sugar Series. She is familiar with the
12 images/videos in this series and able to verify their identities and ages.
13
14

15 **SSA Joshua Findley**

16 Department of Homeland Security Immigration and Customs Enforcement
17 [REDACTED]
18 Joshua.s.findley@dhs.gov

19 **And**

20 **Detective Roy Shepherd, retired**

21 [REDACTED] Police Department
22 Roy.shepherd31@gmail.com

23 Supervisory Special Agent Joshua Findley is the current, and Retired Detective Roy
24 Shepherd is the former, Law Enforcement Point of Contact regarding Lily of the Vicky Series.
25 SSA Findley and Detective Shepherd are able to verify her identity and age.
26

27 **Jane Smith**

28 PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
REQUIRED INITIAL DISCLOSURES - 12

CAROL L. HEPBURN, P.S.
ATTORNEYS AT LAW
PO Box 17718
SEATTLE, WA 98127
TEL: (206) 957-7272 / FAX: (206) 957-7273

Contact through Plaintiffs' counsel

Jane Smith is the mother of Tori and can verify her identity and age.

Jane Doe and her husband
Contact through Plaintiffs' counsel

Jane Doe and her husband are the parents of Skylar and Savannah and can verify their identities and ages.

John Doe and his wife
Contact through Plaintiff's counsel

John Doe and his wife are the parents of Sierra and Sally and can verify their identities and ages.

Mother of Violet as identified through confidential documents in discovery
Contact through Plaintiffs' counsel

Mother of Violet is the parent of Violet and can verify her identity and age.

Jane Roe
Contact through Plaintiffs' counsel

Jane Roe is the mother of Pia and Mya and can verify their identities and ages.

DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS IN ITS POSSESSION, CUSTODY, OR CONTROL
(Fed. R. Civ. P. 26(a)(1)(A)(ii))

The Plaintiffs describe the following documents, electronically stored information, and tangible things in their possession, custody, or control which may be used to support their claims:

- 1) All documents filed in *United States v. Randall Steven Curtis*, United States District Court, Northern District of California, San Francisco, Case 3:16-cr-00510-SI-1, including but not limited to:

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
REQUIRED INITIAL DISCLOSURES - 13

CAROL L. HEPBURN, P.S.
ATTORNEYS AT LAW
PO Box 17718
SEATTLE, WA 98127
TEL: (206) 957-7272 / FAX: (206) 957-7273

- a) Indictment;
 - b) Criminal Minutes Change of Plea Proceedings;
 - c) Stipulation Re Restitution to Claimants Other Than “CC”;
 - d) Government’s Sentencing Memorandum including Exhibits 1-11;
 - e) Amended Judgment in a Criminal Case as to Randall Steven Curtis;
 - f) Transcript of Proceedings Regarding Plea Agreement
 - g) Transcript of Sentencing Hearing.
- 2) Notices received from the Department of Justice Victim Notice System concerning the Defendant’s prosecution.
 - 3) Current Curriculum Vitae and testimony log of Kevin J. Laws
 - 4) Fee Schedule of Kevin J. Laws
 - 5) Documentation of identities of all plaintiffs including names, birth dates and the original child sex abuse image exploitation perpetrators.
 - 6) Name change documentation for Plaintiff Lily.
 - 7) Final Decrees of Adoption for Sierra, Sally, Skylar and Savannah of the Jan_Socks series.
 - 8) Affidavit of Lauren Coffren, Director of the Exploited Children Division (ECD) at the National Center for Missing and Exploited Children with records related to Randall Steven Curtis, ECD Technical Assistance Report [REDACTED] which provides information related to the plaintiffs herein from files submitted by law enforcement from the criminal investigation of Randall Steven Curtis.
 - 9) The Attorney Series Information Reports from NCMEC of the plaintiffs series of child sex abuse image exploitation images as follows:
 - a) Vicky series;

- b) Marineland series;
- c) Jan_Socks series;
- d) At School series;
- e) Lighthouse series;
- f) Sweet Sugar series;
- g) Misty series;
- h) Jenny series;
- i) Jessica series; and
- j) PinkHeartSisters series.

9) Sanitized images of Plaintiffs' child sexual assault material.

The Plaintiffs also plan on requesting the discovery received by the Defendant from the government in his criminal prosecution in *United States v. Randall Steven Curtis*, United States District Court, Northern District of California, Case No. 3:16-cr-00510-SI-1.

B. COMPUTATION OF DAMAGES
(Fed. R. Civ. P. 26(a)(1)(A)(iii))

The Plaintiffs provide the following computation of each category of damages:

- 1) Liquidated Damages – each Plaintiff is seeking liquidated damages of \$150,000 pursuant to 18 U.S.C. 2255.
- 2) Attorney Fees – Plaintiffs are seeking attorney fees pursuant to 18 U.S.C. 2255 in excess of \$10,000 subject to a final determination by the Court after trial.

1 **C. INSURANCE AGREEMENTS**
2 **(Fed. R. Civ. P. 26(a)(1)(A)(iv)**

3 Plaintiffs request discovery of any insurance agreements, including excess and umbrella
4 policies, under which an insurance business may be liable to satisfy all or part of a possible
5 judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

6 Plaintiffs reserve the right to supplement and/or amend this list as additional discovery,
7 documents, and information are produced by the parties, and as discovery proceeds in this case.
8

9
10 Dated this 28th day of October, 2020.

11 /s/ John A. Kawai

12 John A. Kawai, CSBN 260120
13 CARPENTER, ZUCKERMAN, & ROWLEY
14 407 Bryant Circle, Suite F
15 Ojai, CA 93023
16 Phone: 805-272-4001
17 Email: jk@czrlaw.com
18 Attorney for Plaintiffs

19 /s/ Carol L. Hepburn

20 Carol L. Hepburn, *Pro Hac Vice*
21 CAROL L. HEPBURN, P.S.
22 200 First Ave. West, Suite 550
23 Seattle, WA 98119
24 Phone: 206-957-7272
25 Email: carol@hepburnlaw.net
26 Attorney for Plaintiffs Lily, Sarah, Skylar,
27 Savannah, Sally, Sierra, Violet, Amy, Erika, Tori,
28 Jenny and Jessica

29 /s/ Deborah A. Bianco

30 Deborah A. Bianco, *Pro Hac Vice*
31 DEBORAH A. BIANCO, PLLC
32 14535 Bel-Red Road, #201
33 Bellevue, WA 98007

Phone: 425-747-4500
Email: deb@debbiancolaw.com
Attorney for Maureen, Pia, and Mya

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1)
REQUIRED INITIAL DISCLOSURES - 17

CAROL L. HEPBURN, P.S.
ATTORNEYS AT LAW
PO Box 17718
SEATTLE, WA 98127
TEL: (206) 957-7272 / FAX: (206) 957-7273

John A. Kawai, CSBN 260120
 CARPENTER, ZUCKERMAN & ROWLEY
 407 Bryant Circle, Suite F,
 Ojai, CA 93023
 Tel: (805) 272-4001
 Fax: (805) 719-6858
 Email: jk@czrlaw.com
 Of Attorneys for Plaintiffs

Deborah A. Bianco, *Pro Hac Vice*
 14535 Bel-Red Road, #201
 Bellevue, WA 98007
 (425) 747-4500
 Email: deb@debbiancolaw.com
 Attorney for Plaintiffs Maureen, Pia, and Mya

Carol L. Hepburn, *Pro Hac Vice*
 200 First Avenue West, #550
 Seattle, WA 98119
 Tel: (206) 957-7272
 Fax: (206) 957-7273
 Email: carol@hepburnlaw.net
 Attorney for Plaintiffs Lily, Sarah,
 Skylar, Savannah, Sally, Sierra, Violet,
 Amy, Erika, Tori, Jenny, and Jessica

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

“AMY,” “ERIKA,” JANE SMITH as next of
 friend for “TORI” minor, “JENNY,”
 “JESSICA,” “LILY,” “SARAH,” JANE DOE
 as court appointed conservator for “SKYLAR”
 and “SAVANNAH” minors, JOHN DOE as
 court appointed conservator for “SALLY” and
 “SIERRA” minors, “MAUREEN,” WILLIAM
 L.E. DUSSAULT as Guardian ad Litem for
 “VIOLET” minor, and JANE ROE as next
 friend for “PIA,” and “MYA,”

Plaintiffs,

v.

RANDALL STEVEN CURTIS,

Defendant.

NO. 19 CV 2184 PJH

DECLARATION OF DEBORAH A.
 BIANCO IN SUPPORT OF PLAINTIFFS’
 REPLY TO PLAINTIFFS’ MOTION FOR
 SUMMARY JUDGMENT

NOTE ON MOTION CALENDAR:

Date: February 25, 2021

Time: 1:30 pm

Judge: Honorable Phyllis J. Hamilton

Chief United States District Court Judge

1
2
3 I, DEBORAH A. BIANCO, hereby declare the following:
4

5 1. I am an attorney licensed to practice law in the States of Washington, Missouri and
6 Illinois, and I am admitted Pro Hac Vice for this case, in the United States District Court, Northern
7 District of California.

8 2. I represent the Plaintiffs herein. I make this Declaration in support of Plaintiffs' Reply
9 to the Motion for Summary Judgment.
10

11 3. In preparation for the Motion for Summary Judgment I conferred with the
12 plaintiff known as Jane Roe, the mother of Pia and Mya, and prepared a Declaration for her
13 signature. The Declaration was transmitted to her electronically, and transmitted back to us,
14 electronically. There were some changes in format, but the substance of the Declaration we
15 received with Jane Roe's signature was identical to the Declaration I sent her. We submitted to
16 the Court the signed declaration we received from Jane Roe.
17

18 4. I subsequently mailed Jane Roe a paper copy of her Declaration, which she signed
19 and returned, and which I attach hereto a true and correct copy as Exhibit 1. I have omitted the
20 partially redacted CSAM pictures which were exhibits to the original declaration. Otherwise, it is
21 identical in content to the Declaration signed by Jane Roe and submitted to the Court at the time
22 the Motion for Summary Judgment was filed. I have partially redacted Jane Roe's signature.
23

24 5. Defense counsel served his initial disclosures herein on August 7, 2019 and at that
25 time named the next friends (parents), conservators (parents), and William L.E. Dussault,
26 (Violet's Guardian ad Litem) as persons with discoverable information. Defense counsel served
27 amended initial disclosures on August 22, 2019 and again on November 4, 2019, both of which
28

1 again named the next friends (parents), conservators (parents), and William L.E. Dussault,
2 (Violet's Guardian ad Litem) as persons with discoverable information.
3

4 I hereby declare under penalty of perjury under the laws of the United States of America that
5 the foregoing is true and correct to the best of my knowledge.

6 DATED this 5th day of February, 2021.

7 DEBORAH A. BIANCO, P.S.
8

9 By /s/ Deborah A. Bianco
10 Deborah A. Bianco, *Pro Hac Vice*
11 PO Box 6503
12 Bellevue, WA 98008
13 Phone: 425-747-4500
14 Email: deb@debbiancolaw.com
15 Attorney for Plaintiffs
16
17
18
19
20
21
22
23
24
25
26
27
28

John A. Kawai, CSBN 260120
 CARPENTER, ZUCKERMAN & ROWLEY
 407 Bryant Circle, Suite F,
 Ojai, CA 93023
 Tel: (805) 272-4001
 Fax: (805) 719-6858
 Email: jk@czrlaw.com
 Of Attorneys for Plaintiffs

Deborah A. Bianco, *Pro Hac Vice*
 14535 Bel-Red Road, #201
 Bellevue, WA 98007
 (425) 747-4500
 Email: deb@debbiancolaw.com
 Attorney for Plaintiffs Maureen, Pia, and Mya

Carol L. Hepburn, *Pro Hac Vice*
 200 First Avenue West, #550
 Seattle, WA 98119
 Tel: 206) 957-7272
 Fax: (206) 957-7273
 Email: carol@hepburnlaw.net
 Attorney for Plaintiffs Lily, Sarah,
 Skylar, Savannah, Sally, Sierra, Violet,
 Amy, Erika, Tori, Jenny, and Jessica

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

“AMY,” “ERIKA,” JANE SMITH as next of
 friend for “TORI” minor, “JENNY,”
 “JESSICA,” “LILY,” “SARAH,” JANE DOE
 as court appointed conservator for “SKYLAR”
 and “SAVANNAH” minors, JOHN DOE as
 court appointed conservator for “SALLY” and
 “SIERRA” minors, “MAUREEN,” WILLIAM
 L.E. DUSSAULT as Guardian ad Litem for
 “VIOLET” minor, and JANE ROE as next
 friend for “PIA,” and “MYA,”

Plaintiffs,

v.

RANDALL STEVEN CURTIS,

Defendant.

NO. 19 CV 2184 PJH

DECLARATION OF JANE ROE RE:
 MYA/SWEET PINK SUGAR AND
 PIA/SWEET WHITE SUGAR IN SUPPORT
 OF PLAINTIFFS’ MOTION FOR
 SUMMARY JUDGMENT

NOTE ON MOTION CALENDAR:

Date:

Time:

Judge: Honorable Phyllis J. Hamilton

Chief United States District Court Judge

1
2
3 I, Jane Roe, hereby declare the following:

4 1. I am the biological mother of two of the Plaintiffs in this matter: Mya and Pia. I make
5 this declaration in support of Plaintiffs Mya and Pia, and their Motion for Summary Judgment.

6 2. I make this statement based on my personal knowledge having been the parent of these
7 two young women. I have had sole custody of them since their father's arrest and conviction. My
8 daughters are depicted in what is known as the "Sweet Sugar" series of child sex abuse images
9 (CSAM).

10 3. At the time the crimes were committed all of the children involved were minors.
11 My middle daughter is known as "Mya" the pseudonym she is recognized by in court
12 proceedings. Her name was [REDACTED] I changed my daughters' last names to
13 [REDACTED] after their father's conviction. Mya's date of birth is [REDACTED] Her younger sister,
14 known as "Sweet White Sugar" or "Pia," in court proceedings, is still a minor. Her name was
15 [REDACTED] and I changed her last name to [REDACTED] as well. Her date of birth is
16 [REDACTED] Both girls continue to reside with me.

17 4. At the time of the arrest/investigation Pia was [REDACTED] years old and
18 Mya was [REDACTED] years old. The production of child pornography and the
19 exploitation occurred on multiple occasions in our home, in [REDACTED] and the images
20 traveled in international as well as interstate commerce. It has been over 10 years since
21 the police intervened, and my former husband was arrested. In the years since the arrest
22 and prosecution of my former husband I have received numerous notices of prosecutions
23 in the U.S. In 2016, I retained counsel in the U.S. to represent my daughters.

1 5. The entire set of images and videos in this series has been known as the “Sweet
2 Sugar” Series but has now been broken down by victim. Images/videos of Pia are now known as
3 the “Sweet White Sugar” Series and images of Mya are known as the “Sweet Pink Sugar” Series.

4 6. The redacted photograph attached to this declaration as Exhibit 1 is a photograph which
5 I recognize to be an image of my daughter, known in this action as Mya. The redacted photo attached
6 hereto as Ex. 1 is a photo of Mya taken during the sexual exploitation she endured as a child. The
7 background behind her head is pink and she is smiling. I recognize the background as being Mya’s
8 bed sheet. I recognize the image of Mya as she appeared when she was [REDACTED] old.

9 7. The redacted photograph attached to this declaration as Exhibit 2 is a photograph
10 which I recognize to be an image of my daughter known as Pia in this action. The photo attached
11 hereto as Ex. 2 is a photo of Pia taken during the sexual exploitation she endured as a child. Pia is
12 wearing a blue Cinderella dress-up outfit that she wore when she was about [REDACTED] old. I also
13 recognize the bed, dresser and shelves in the background of the photograph as being the same as those
14 in Mya and Ava’s bedroom in our home when the girls were younger, and before their father was
15 arrested.

16 8. The redacted photograph attached to this declaration as Exhibit 3 is a photograph which
17 I recognize to be an image of my daughter, known in this action as Pia. The redacted photo attached
18 hereto as Ex. 3 is a photo of Pia taken during the sexual exploitation she endured as a child. Pia had
19 long blonde curly hair, that was (as it is in this picture) frequently in two ponytails. Because her hair
20 was fine, we used clips, such as the blue clips shown in her hair in this photo to help keep her hair in
21 ponytails. I recognize my daughter’s facial features as they appeared when she was [REDACTED] old.
22 Based on the color of the walls, and the background that I can see in this photo, it was taken in Mya
23 and Ava’s bedroom in our home..

Jane Roe, Plaintiff and Next Friend

John A. Kawai, CSBN 260120
 CARPENTER, ZUCKERMAN & ROWLEY
 407 Bryant Circle, Suite F,
 Ojai, CA 93023
 Tel: (805) 272-4001
 Fax: (805) 719-6858
 Email: jk@czrlaw.com
 Of Attorneys for Plaintiffs

Deborah A. Bianco, *Pro Hac Vice*
 14535 Bel-Red Road, #201
 Bellevue, WA 98007
 (425) 747-4500
 Email: deb@debbiancolaw.com
 Attorney for Plaintiffs Maureen, Pia, and Mya

Carol L. Hepburn, *Pro Hac Vice*
 200 First Avenue West, #550
 Seattle, WA 98119
 Tel: (206) 957-7272
 Fax: (206) 957-7273
 Email: carol@hepburnlaw.net
 Attorney for Plaintiffs Lily, Sarah,
 Skylar, Savannah, Sally, Sierra, Violet,
 Amy, Erika, Tori, Jenny, and Jessica

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

“AMY,” “ERIKA,” JANE SMITH as next of
 friend for “TORI” minor, “JENNY,”
 “JESSICA,” “LILY,” “SARAH,” JANE DOE
 as court appointed conservator for “SKYLAR”
 and “SAVANNAH” minors, JOHN DOE as
 court appointed conservator for “SALLY” and
 “SIERRA” minors, “MAUREEN,” WILLIAM
 L.E. DUSSAULT as Guardian ad Litem for
 “VIOLET” minor, and JANE ROE as next
 friend for “PIA,” and “MYA,”

Plaintiffs,

v.

RANDALL STEVEN CURTIS,

Defendant.

NO. 19 CV 2184 PJH

DECLARATION OF KEVIN J. LAWS IN
 SUPPORT OF PLAINTIFFS’ REPLY TO
 PLAINTIFFS’ MOTION FOR SUMMARY
 JUDGMENT

NOTE ON MOTION CALENDAR:

Date: February 25, 2021

Time: 1:30 pm

Judge: Honorable Phyllis J. Hamilton

Chief United States District Court Judge

DECLARATION OF KEVIN J. LAWS IN SUPPORT OF
 PLAINTIFFS’ REPLY TO PLAINTIFFS’ MOTION FOR
 SUMMARY JUDGMENT - 1

1
2
3 I, KEVIN J. LAWS, hereby declare the following:

4
5 1. I am an adult over the age of 18 years, and fully competent to make this declaration in
6 support of Plaintiffs' Reply In Support of Plaintiffs' Motion for Summary Judgment on my personal
7 knowledge.

8
9 2. I make this declaration to respond to assertions and implications in the
10 defendant's response to plaintiffs' summary judgment motion. The information in this
11 declaration was not inquired about in my deposition of January 26, 2021.

12 3. **Timing of Evidence Review.** The review of evidence in this case was only the
13 first evidence review of evidence in any Homeland Security Investigations (HSI) to the best of
14 my knowledge. And it was only the second such evidence review with any agency so far as I
15 know. I had done one prior in Nevada. In order to perform an evidence review I had to
16 purchase a special laptop which would be solely dedicated to this purpose. I had to research
17 what software would be available to a person outside of law enforcement which would be
18 sufficient to accomplish the task at hand. I also needed to assemble as many hash values for
19 the child sex assault images of the victims in question as I could. This process took several
20 months.
21

22
23 4. In the meantime, and having worked with HSI for many years, I knew that I could
24 not simply show up on the doorstep of the case agent and expect to see the evidence even
25 though the new statute allowed for it. I knew that the agency would want a protocol in place
26 for such a process. To that end I contacted a senior person in the Child Exploitation section of
27 HSI. I asked for a meeting to discuss the prospect of an evidence review. This meeting took at

28
DECLARATION OF KEVIN J. LAWS IN SUPPORT OF
PLAINTIFFS' REPLY TO PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT - 2

1 least two months to arrange but did take place in mid-January 2020. At the meeting no
2 resolution was reached due to the need of the agency to have their legal counsel weigh in on
3 the process. It was another two months (March 2020) before I heard back that we were able
4 to proceed.
5

6 5. In March of 2020 the Covid19 lockdowns began. We had to consider how HSI
7 could accommodate the request for the evidence review in light of their lockdown. The first
8 date offered to me by the HSI supervisor in San Francisco was the week of July 13, 2020 and I
9 immediately confirmed that time for our review.
10

11 6. I purposely did not want to receive sanitized images from the case against Mr.
12 Curtis before I conducted the evidence review. I did not want those images in my mind before
13 conducting a search on my own of the computer media. After conducting the evidence review,
14 and on or about October 13, 2020 I received from Supervisor Barfuss at the HSI San Francisco
15 office an email with password protected sanitized images she advised were from the Curtis
16 case. A number of these I recognized from having done the evidence review; some I did not.
17

18 I hereby declare under penalty of perjury under the laws of the United States of America that
19 the foregoing is true and correct to the best of my knowledge.
20

21 DATED this 5th day of February, 2021.
22

23 *Kevin J. Laws*

24 KEVIN J. LAWS
25
26
27
28

DECLARATION OF KEVIN J. LAWS IN SUPPORT OF
PLAINTIFFS' REPLY TO PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT - 3